TSD File Inventory Index

Date: July 15, 2004

Initial: CMHoward

Facility Name	Cleveland Pneumatic Plating (One folder site)		
Facility Identification Number	OHD 004173621		
A.1 General Correspondence	√	**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	√	.1 Correspondence	
.1 Correspondence	√	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	√	**C.1 Compliance - (Inspection Reports)**	√
.3 Part A Application and Amendments	√	**C.2 Compliance/Enforcement**	√
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	√
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	√	.3 State Prelim. Investigation Memos	
.1 Correspondence	√	.4 RFA Reports	√
.2 Closure/Post Closure Plans, Certificates, etc	√	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

5 RFI QAPP		7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		.2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
6 CMI Correspondence		.9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports

Comments Documents do not justify individual folder guidelines

A.1 Public Participation

OHD004 173621

TO: Brian Klatt
0105 OH
2

Metals Applied
Incorporated
Subsidiary of Cleveland Pneumatic Co.
2800 East 33rd Street
Cleveland, Ohio 44115
216 / 241-5913

PneumoAbex
An **IC Industries** Company

O: WMD
CC: RF

October 3, 1988

Regional Administrator
U. S. EPA
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Sir:

This letter is in regard to disposal of our cyanide bearing waste streams by GSX Chemical Services of Ohio, Inc.

Please be advised that we have reviewed the methods for treatment of our cyanide waste, and that cyanide destruction by the GSX process yields the greatest environmental benefit. Accordingly, this letter constitutes certification to that effect, in accordance with CFR 240, Section 268.8(A)(2)(ii).

This certification covers our cyanide waste streams under F007 and F009.

Please contact me direct if you need any additional information for this certification.

Sincerely,

Joseph Benedetto
Plating Operations
Manager

JB/mk

cc: Mr. W. Reasoner, GSX

RECEIVED
OCT 14 1988
U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

F. HARRIS (HRE-8J)

P 140 686 662

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☒ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Thomas Crepeau
Ohio Environmental Protection Agency
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-1049

4a. Article Number
P 140 686 662

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
OCT 19 1992

5. Signature (Addressee)

6. Signature (Agent)
Bob Linden

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1991 ☆U.S. GPO: 1992—323-402 DOMESTIC RETURN RECEIPT

PS Form 3800, June 199

Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to: Mr. Thomas Crepeau
Ohio Env. Protect. Agency
Street and No. 1800 WaterMark Drive
P.O. Box 1049
P.O., State and ZIP Code Columbus, Ohio 43266-1049

Postage	$ 2.40
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.00
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$ 4.40
Postmark or Date	OCT 19 1992

CHICAGO, IL LOOP STA. OCT 19 1992 USPO

A.2 Part A/
Interim Status

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

June 21, 1993

Cleveland Pneumatic Plating
Attn: Ajit Patra
2800 East 33rd Street
Cleveland, OH 44115

RE: EPA ID#: *OHD004173621*

LOCATION of INSTALLATION: *2800 E 33rd St*
Cleveland, OH 44115

In response to your request of March 1993 the following information has been updated:

Contact: Ajit Patra

Name: Cleveland Pneumatic Plating
(formerly listed as Metals Applied)

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V
Ohio EPA District Office

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

MAY - 5 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Pablo Prieto, Manager, Q.A.
Metals Applied
2800 East 33rd Street
Cleveland, Ohio 44115

RE: Interim Status Acknowledgement USEPA ID No. OHD 004 173 621
FACILITY NAME: METALS APPLIED

Dear Mr. Prieto:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

5/12/82

Enclosure

cc: Timothy Aish

FACILITY NAME	EPA ID NUMBER
METALS APPLIED	OHD004173621

FACILITY OPERATOR

METALS APPLIED

FACILITY OWNER

CLEVELAND PNEUMATIC CO

FACILITY LOCATION

2800 EAST 33RD STREET
CLEVELAND OH 44115

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
T01	2100.00000	U
S01	11000.00000	G

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G OR L
TANK	S02	G OR L
WASTE PILE	S03	Y OR C
SURFACE IMPOUNDMENT	S04	G OR L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
OTHER	T04	J,R,N,S,U,V

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS\HOUR	W
GALLONS\HOUR	E
LITERS\HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS\HOUR	J
KILOGRAMS\HOUR	R
TONS PER DAY	N
METRIC TONS\DAY	S

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ OHD004173621 REACKNOWLEDGEMENT

METALS APPLIED
2800 EAST 33RD STREET
CLEVELAND OH 44115

INSTALLATION ADDRESS ➤

2800 EAST 33RD STREET
CLEVELAND OH 44115

EPA Form 8700-12B (4-80)

09/29/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
OSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

Correct Contact 3-9-81 ✓
Add Waste Codes: F017, F018

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
S F OHD004173621 T/A C 1		

I. NAME OF INSTALLATION

METALS APPLIED PLATING DIVISION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 2800 E. 33RD STREET

CITY OR TOWN	ST.	ZIP CODE
CLEVELAND	OH	44115

LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 2800 E. 33RD STREET

CITY OR TOWN	ST.	ZIP CODE
CLEVELAND	OH	44115

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
PRIETO PABLO PABLO PRIETO VICE PRESIDENT	216-241-5913

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: CLEVELAND PNEUMATIC

DETACH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*
F = FEDERAL
M = NON-FEDERAL
→ M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.:

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S W | T/A | C 1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F006	F008	F009	F017	F018
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P029	P106	U226	U228	P030	
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	PABLO PRIETO VICE-President	10/28/80

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	OHD004173621
I. NAME OF INSTALLATION	Change Contact
II. INSTALLATION MAILING ADDRESS	Add Waste Codes: F017 F018
III. LOCATION OF INSTALLATION	000110 AUG 25 80

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F OHD004173621 T/A 2 C 1	A	80 08 18

I. NAME OF INSTALLATION

METALS APPLIED-PLATING DIVISION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 2800 E.33RD

CITY OR TOWN	ST.	ZIP CODE
CLEVELAND	OH	44115

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 2800 E33RD ST.

CITY OR TOWN	ST.	ZIP CODE
6 CLEVELAND	OH	44115

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 ~~PRIETO PABLO~~ AISH TIMOTHY VICE PRES.	216-241-5913

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 CLEVELAND PNUEMATIC CO.

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): F = FEDERAL, M = NON-FEDERAL — M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: OHD004173621

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 20 1980

CONTINUE ON REVERSE

FOR OFFICIAL USE ONLY

															T/A	C
S	W	0	H	D	0	0	4	1	7	3	6	2			2	1
1	2												13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F006	F008	F009		
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P029	P106	U226	U228	P030	
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Timothy Aisk	Manager, Quality Assurance	8/15/80

DETACH

DETACH

Pneumo
An IC Industries Company

Albert C. Ruehmann III
Counsel
Cleveland Pneumatic
Company

Pneumo Corporation
3781 East 77th Street
Cleveland, OH 44105
(216) 341 1700

LEGAL - 2349

February 28, 1986

United States Environmental Protection Agency
Region 5
230 S. Dearborn Street
Chicago, Illinois 60604

Attention: David A. Stringham
Chief, Solid Waste Branch

RE: Metals Applied, Inc. Hazardous Waste
Permit Application; U.S. EPA ID# OHD 004173621

Dear Mr. Stringham:

We are in receipt of your letter dated January 31, 1986 to Metals Applied in which you requested our response to an enclosed certification statement regarding potential releases from solid waste management units.

In response to your request, we are returning your certification statement without completion and enclosing copies of prior correspondence, including a copy of a letter sent by your office to Metals Applied, Inc., dated September 27, 1984, which formally terminated our facility's interim status as a storage facility under Federal rules. Since this action took place prior to the enactment on November 8, 1984 of the Hazardous and Solid Waste Amendments of 1984, your certification statement would not appear to be presently applicable.

Sincerely yours,

Al Ruehmann

Albert C. Ruehmann III
Asst. Secretary of Metals Applied, Inc.

ACR:ag

Enclosures

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 27 1984

REPLY TO ATTENTION OF:
5HW-13

Mr. Pablo Prieto
Vice President Manufacturing
Metals Applied Incorporated
2800 East 33rd Street
Cleveland, Ohio 44115

RE: Withdrawal of Part A
FACILITY NAME: Metals Applied Incorporated
U.S. EPA ID #: OHD 004-173-621

Dear Mr. Prieto:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you propose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to $25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

Sincerely yours,

William H Meiss Co

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Tom Carlisle, Ohio EPA
Cheryl Kaiser, Ohio EPA

SEP 27 1984

5HW-13

Mr. Pablo Prieto
Vice President Manufacturing
Metals Applied Incorporated
2800 East 33rd Street
Cleveland, Ohio 44115

RE: Withdrawal of Part A
FACILITY NAME: Metals Applied Incorporated
U.S. EPA ID #: OHD 004-173-621

Dear Mr. Prieto:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you purpose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to $25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Tom Carlisle, Ohio EPA
Cheryl Kaiser, Ohio EPA

bcc: Lisa Pierard
Part A File
Rebecca Strom

5HW-13:RStrom:PGrace:9-19-84

9/28/84
9-27-84 JS

INITIALS / DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	CHIEF	WMD DIRECTOR
	9/19/84	9/19/84		9/27/84		9/27/84	9/27	

INTER-OFFICE COMMUNICATION

TO Tom Carlisle and Jim Flautt, DHMM, C.O. DATE January 30, 1984

FROM: Rod Beals, DHMM, Northeast District Office

SUBJECT: Metals Applied (#02-18-0498) Permit Withdrawal Request

On January 24, 1984, I conducted an inspection of the Metals Applied facility. Metals Applied has contracted Alchemtron to remove the hazardous waste they generate on a regular basis to comply with generator only regulations. Alchemtron removed all hazardous waste previously accumulated by Metals Applied on December 14, 1983. The permitted storage area will continue to be used for less than 90 day storage. Metals Applied was in compliance of the State generator regulations at the time of this inspection.

RB:km

INTER-OFFICE COMMUNICATION

TO Peggy Vince Executive Director, HWFAB
Atten: Bob ragale DATE June 7, 1982

FROM: Paul Flanigan, Manager, Engineering Section thru Chuck Wilhelm, Chief, DHMM

SUBJECT: Recommended Action for Modification to Permit #02-18-0498

We have reviewed the modification request for Permit #02-18-0498 which was issued to:

Company Name Metals Applied

Address 2800 East 33 Street

Cleveland, Ohio 44115

(216) 241-5913

Copy to Part A
K. Homer
6/16/82

This modification was received by DHMM on May 13, 1982 and proposes the following change(s):

1. Facility contact is now Mr. Drew Koler, QA Lab Supervisor.
2. Deletion of F017
3. Addition of F002 2 tons
   D007 included with above
   D008 1.5 tons
   D007 10 tons
   D006 4 tons
   F007 included with above

The technical review of this modification has been completed for conformance with applicable Ohio EPA regulations.

Therefore, having found this modification to be (in compliance/~~not in compliance~~) with applicable Ohio EPA regulations, we recommend:

X APPROVAL _____ DENIAL

Approval conditions/comments:

PF/CJW/maf
CLB/LW
cc: Tom Crepeau, Manager, P&MRS, DHMM
Kathy Homer, USEPA, Region V
N.E.D.O., DHMM
Randy Marshall, DHMM

FORM GEN 1001

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F O H D 0 0 4 1 7 3 6 2 1 D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

RECEIVED
MAY 1982
WASTE MANAGEMENT BRANCH
EPA - REGION V

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: METALS APPLIED

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 KOLER DREW QA LAB SUPERVISOR	216 241 5913

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	
3 2800 EAST 33 STREET	
B. CITY OR TOWN	**C. STATE** / **D. ZIP CODE**
4 CLEVELAND	OH / 44115

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
5 2800 EAST 33 STREET	
B. COUNTY NAME	
CUYAHOGA	
C. CITY OR TOWN	**D. STATE** / **E. ZIP CODE** / **F. COUNTY CODE** *(if known)*
6 CLEVELAND	OH / 44115 /

RECEIVED 5/17/82

EPA Form 3510-1 (6-80)

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3471 (specify) Electroplating	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: METALS APPLIED

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)
M (specify) PNEUMO CORP.

D. PHONE (area code & no.): A 216 241 5913

E. STREET OR P.O. BOX: 2800 EAST 33 STREET

F. CITY OR TOWN: CLEVELAND

G. STATE: OH

H. ZIP CODE: 44115

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N	9 P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U	9 13180059490R00 (specify) OHIO EPA PAINTSPRAY BOOTH

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

METAL FINISHING - ELECTROPLATING

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
PABLO PRIETO, Vice President Processing		4/29/80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S													T/A	C
F	0	H	D	0	0	4	1	7	3	6	2	1		1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	80	08	31

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[X] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S01	11,000 gallons	G	
2				
3				
4				
5				
6				
7				
8				
9				
10				

S													T/A	C
C	D	U	P											1

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													T/A	C	FOR OFFICIAL USE ONLY													T/A	C	
S	W	0	H	D	0	0	4	1	7	3	6	2	1		1	S	W	D	U	P									2	D U P
1	2												13	14	15	1	2										13	14	15	23 - 26

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code) 23 - 26	B. ESTIMATED ANNUAL QUANTITY OF WASTE 27 - 35	C. UNIT OF MEASURE (enter code) 36	D. PROCESSES 1. PROCESS CODES (enter) 27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F001	2	T	S01	
2	F006	52	T	S01	
3	F008	2	T	S01	
4	F009	2	T	S01	
5	P029	20	P	S01	
6	P106	20	P	S01	
7	U226	2	T	S01	
8	U228	2	T	S01	
9	P030	2	T	S01	
10	F002	2	T	S01	
11	D007				Included with Above
12	D008	1.5	T	S01	
13	D007	10	T	S01	
14	D006	4	T	S01	
15	F007				Included with Above
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F | O H D 0 0 4 1 7 3 6 2 1 | T/A | C 6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 28 000	081 40 000

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E CLEVELAND PNEUMATIC COMPANY	216-341-1700

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 3781 EAST 77 STREET	G CLEVELAND	OH	44105

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
PABLO PRIETO	Pablo Prieto	4/29/82

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
TIMOTHY AISH	Timothy Aish	4/27/82

 CONTINUE ON PAGE 5

Metals Applied
Incorporated
Subsidiary of Cleveland Pneumatic Co.
2800 East 33rd Street
Cleveland, Ohio 44115
216 / 241-5913

Pneumo

May 12, 1982

U.S. Environmental Protection Agency Region V
RCRA Activities/P. O. Box A 3587
Chicago, Illinois 60690-3587

Attention: Elizabeth Utley

Dear Madam:

We are revising Part A of our Hazardous Waste Permit Application to add and/or delete certain EPA Hazardous Waste Numbers and estimated Annual Quantity of Waste(s) for Item IV. Description of Hazardous Wastes (EPA Form 3510-3).

After submitting Part A of our Hazardous Waste Permit Application, we continued to determine whether certain of our solid wastes were hazardous. This was done based on our knowledge of the waste in regards to the materials and processes used and also by testing the waste according to the applicable methods in Subpart C of 40CFR Part 261. We have also obtained additional information of a proprietary nature from our manufacturing suppliers indicating the hazardousness of certain wastes. There were also some EPA regulatory changes and definition misinterpretations on our part that require changes to the application.

Because the detailed testing and supplier information was not available at the time the application was submitted, we continued to handle the wastes in question as hazardous and decided to report the information as it became available to us for reporting.

These changes to the initial application submittal are due to the continuance of detailed testing and supplier information, EPA regulatory changes and our initial lack of understanding in interpreting the complex regulations.

Please refer to Page 3 of EPA Form 3510-3 in reference to the following changes:

Line number 1-9; no changes.

The changes to lines 10 and 11 were required for the following reasons: The Notification of Hazardous Waste Activity Packet which EPA mailed in June, 1980 contained an additional set of Hazardous Wastes scheduled for June promulation. In order to avoid filing two (2) Notification forms, we included EPA Hazardous Waste No. F017 because we felt this best described the wastes generated by our painting department. This EPA Waste number is no longer applicable to our paint department wastes because EPA suspended this Waste number after we filed Part A in November, 1980. Also, because of the proprietary nature of the various paint/solvent formulations we use in our

painting department, we were unable to determine the exact chemical constituents at that reporting time. We have since obtained information from one of our suppliers indicating the methylene chloride (F002) is one of the active solvent ingredients. In lieu of the EPA listing suspension of paint manufacturing/user wastes, we had our paint department wastes tested to determine if they exhibited the characteristics of ignitability or EP toxicity. Although the paint department wastes did not exhibit the characteristics of ignitability, the waste showed the characterisitic of EP toxicity for chromium (D007).

The waste corresponding to line 12 is generated by the residue collected from the manufacture of lead fixtures used in our chromium plating department. Based on our knowledge of this process and wastes, we feel it would exhibit the characteristic of EP toxicity for Lead (D008).

The waste corresponding to line number 13 is generated by the chromium plating department from masking/taping, sludges and various other solid wastes contaminated with chromium plating solution. This waste was not reported on the initial application because there was no specific or non-specific listing for it. The waste was tested for the characteristic EP toxicity after the application was sent in and showed the characteristic for Chromium (D007).

The additions to lines 14 and 15 were required for the following reasons: These wastes are generated by our cadmium/cyanide plating department from masking/taping and various other solid wastes contaminated with cadmium/cyanide plating solution. We originally reported these wastes under cyanide sludges (F008) due to a misinterpretation of the term "sludge". We have since had a clarification through discussions with the EPA and found that the more appropriate term is hazardous waste "mixture" containing EPA Code number F007.

This waste was further tested for the characteristic EP toxicity and showed the characteristic for Cadmium (D006). This information was not available until after the application was filed.

I hope this additional information will be sufficient for meeting our update requirements.

Yours truly,

Pablo Prieto
Vice President
Processing

PP/DRK/mh

DATE REQUEST RECEIVED	NAME OF REQUESTER (Organization & Contact Person)	TYPE OF REQUEST	REJECT OR ACCEPT & DATE	STATUS OF REQUEST	REGIONAL STAFF $/HOURS 79	REGIONAL STAFF $/HOURS 80	CONSULTA $/ HOURS 79	CONSULTA $/ HOURS 80
11-23-79 (Kawatachi)	City of Belleville IL William Knapp Alderman	Resource Recovery - assist City establish RR program.		City requested assistance held in abeyance.	$ 0 0	$ 0 3	$ 0 0	$
11-19-79 (McNeel)	City of Danville, IL Clark Baker City Engineer	Land Disposal (Panels) - assist City correct leachate problem.	3-12-80	Phase II in progress.	$ 0 0	$ 0 32	$ 0 0	$ 25 7
11-14-79 (Steinman)	City of Chicago, IL Dick Radice	Resource Recovery (Panels) assist City prepare RFP for trommel/rotary screen for SW RDF plant.	3-11-80	Phase II work initiated by Contractor.	$ 0 0	$ 0 40	$ 0 0	$ 23
10-24-79 (Burch)	Gallia County, OH Paul Niday President County Commission	Collection/Land Disposal (Panels) (Panel) - assist County outline alternatives for collection and disposal of SW.	3-12-80	Initial Trip completed by consultants in July.	$ 0 0	$ 110 16	$ 0 0	$ 30
10-11-79 (Burch)	Village of Glenview IL Craig Anderson Admin. Ass't	Solid Waste Collection - (Peer Match/Panel) - assist village improve collection system.	3-17-80	Consultant visited the community and requested additional information.	$ 0 0	$ 0 26	$ 0 0	$ 55 2

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 644

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S														T/A	C
F	O	H	D	0	4	1	7	3	6	2	1			3	D
1	2												13	14	15

LABEL ITEMS

- I. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

CLOSED FACILITY. TSD ONLY.

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: METALS APPLIED

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 AISH TIMOTHY MANAGER, Q.A.	216 241 5913

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 2800 EAST 33RD STREET	4 CLEVELAND	OH	44115

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
5 2800 EAST 33RD STREET	CUYAHOGA	6 CLEVELAND	OH	44115	035

EPA Form 3510-1 (6-80)

NOV 18 1980

CONTINUE ON REVERS

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3471 (specify) ELECTROPLATING	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

METALS APPLIED

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

M (specify) PNEUMO CORP.

D. PHONE (area code & no.)

216 341 5913

E. STREET OR P.O. BOX

2800 EAST 33RD STREET

F. CITY OR TOWN

CLEVELAND

G. STATE OH

H. ZIP CODE 44115

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N	**D. PSD** (Air Emissions from Proposed Sources): 9 P
B. UIC (Underground Injection of Fluids): 9 U	**E. OTHER** (specify): 9 Z 1318059490 (specify) OHIO EPA PAINTSPRAY BOOTH
C. RCRA (Hazardous Wastes): 9 R	**E. OTHER** (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9:A/50

XII. NATURE OF BUSINESS (provide a brief description)

METAL FINISHING - ELECTROPLATING

F9:A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
PABLO PRIETO VICE PRESIDENT OF OPERATIONS		11/18/80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA — **EPA**

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: S F | O H D 0 0 4 1 7 3 6 2 1 | T/A 3 | C 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: C 8 | YR. 80 | MO. 08 | DAY 31

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C | DUP | T/A 3 | C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	~~S~~ 0 2	600	G	
X-2	~~T~~ 0 3	20	E	
1	S 0 1	~~750,000 SQFT~~ 11000	G U.B 9/14/87	
2	T 0 1	2100000	~~E~~ H (U.B.)	
3				
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES (.. FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

"NA"

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if yo ve more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): S W OHDØØ4173621 T/A 3 C 1

FOR OFFICIAL USE ONLY: S W DUP T/A 3 C 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F001	2000	T	S01	
2	F006	52000	T	S01	
3	F008	2000	T	S01	*
4	F009	2000	T	S01	*
5	P029	20000	P	S01	*
6	P106	20000	P	S01	*
7	U226	2000	T	S01	
8	U228	20000	T	S01	
9	P030	2000	T	S01	*
~~10~~	~~F017~~	~~100000~~	~~P~~	~~S01~~	
10	~~TOXIC LEAD~~	~~1/2~~ 1500	T	S01	
12					* REFERENCE COMPONENTS OF SAME MATERIAL (STRIP SLUDGE)
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WAS (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S													T/A	C
F	O	H	D	0	0	4	1	7	3	6	2	1	3	6
1	2	-									13		14	15

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6:A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6:B/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)									LONGITUDE (degrees, minutes, & seconds)								
4	1	2	8	0	0	0			0	8	1	4	0	0	0		
65	66	67	68	69	-	71			72	-	74	75	76	77	-	79	

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER			2. PHONE NO. (area code & no.)			
C E	CLEVELAND PNEUMATIC CO.		2 1 6	3 4 1	1 7 0	0
15	16	55	56 - 58	59 - 61	62 -	65

3. STREET OR P.O. BOX		4. CITY OR TOWN		5. ST.	6. ZIP CODE
C F	3781 E77th ST.	C G	CLEVELAND	OH	44105
15	16 - 45	15	16 - 40	41 42	47 - 51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
PABLO PRIETO		11/18/80

X. OPERATOR CERTIFICATION

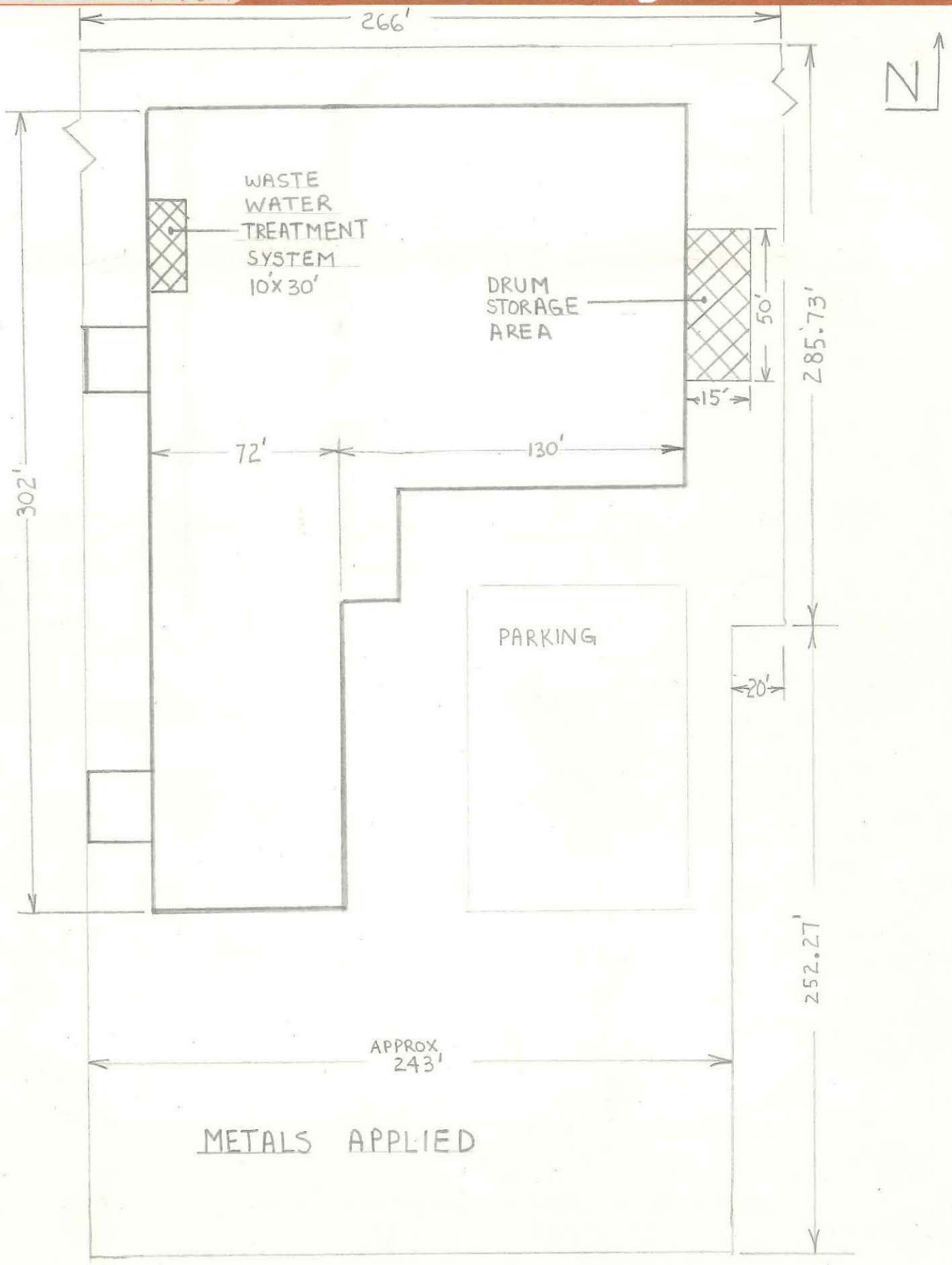
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
TIMOTHY AISH	Timothy Aish	11/18/80

Continued from page 4.

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*



WASTE WATER TREATMENT SYSTEM

DMP Coordinator 1000 System

EAST SIDE

STORAGE AREA

BACK OF BUILDING LEFT

FRONT

FRONT

FRONT

BACK OF BUILDING RIGHT

METALS Applied INC.

2800 EAST 33rd STREET
CLEVELAND, OHIO 44115
Phone: (216) 241-5913

October 28, 1980

Environmental Protection Agency, Region V
RCRA Activities
P.O Box 7861
Chicago, Illinois 60680

Dear Sirs,

Based upon access to new information we find it necessary to resubmit an amended form to the Identification of Hazardous Waste Act report that was submitted to your agency on August 18, 1980.

As indicated on the enclosed amended form items F017 and F18 have been added to the non specific source listingsfrom 40CTR part 261.31.

This amendment will be indicated as a subsequent notification. Presently we have not been issued an EPA I.D. No.

Sincerely,

Pablo Prieto
Vice President Metals Applied
Plating Division

pp/ws

A.4 Closure/Post Closure

OHD 004173621

OHD004173621

Pneumo Corporation
4800 Prudential Tower | Boston, Massachusetts 02199
617 | 262-9300

John F. Foley
Attorney

February 17, 1983

U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

ATTENTION: Ms. Kathy Homer

RE: Metals Applied, Inc. - Financial Guarantee for Closure
EPA ID NO. OHD 004173621 PA, G, TSD, PAS

Dear Ms. Homer:

I enclose the following information required pursuant to the regulations contained in Subpart H of 40 CFR Parts 264 and 265 on behalf of Metals Applied, Inc., which is a second tier subsidiary of Pneumo Corporation:

1. Letter addressed to the EPA from David J. Ruggles, Vice President and Chief Financial Officer of Pneumo Corporation.

2. Copy of letter from Ernst & Whinney, Pneumo's independent accountant. The original of this letter was filed with a letter of financial guarantee for a division of Pneumo Corporation, National Water Lift Company EPA ID NO. MID 00551583, filed January 28, 1983.

3. Copy of letter of Ernst & Whinney attesting to its review of the financials of Pneumo Corporation for the fiscal year ended November 30, 1982.

If you have any further questions or problems with regard to this information, please advise. We did not forward the information contained herein along with the material for National Water Lift Company because we had been unsure whether to write to Ohio EPA or to you.

Very truly yours,

John F. Foley

Metals Applied
Incorporated
Subsidiary of Cleveland Pneumatic Co.
2800 East 33rd Street
Cleveland, Ohio 44115
216 / 241-5913

Thomas E. Crepeau, Manager
Permits and Manifest Records Section
Division of Hazardous Materials Management
Ohio EPA
361 East Broad Street
Columbus, Ohio 43216-1049

Dear Mr. Crepeau:

Pursuant to OAC rule 3745-56-06 and 40CFR, Section 265.115, this notice will serve as certification that the Metals Applied, Inc. Hazardous Waste Storage Facility has been closed in accordance with the specifications in the approved closure plan. The Metals Applied, Inc. Hazardous Waste Storage Facility has been closed in a manner necessary to protect human health and the environment and that minimizes the need for further maintenance.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of these individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Pablo Prieto
Vice President
Manufacturing

12/21/83
Date

Terry G. Check
Independent Registered
Professional Engineer

12.28.83
Date

PP/lw

02-18-0498

Metals Applied
Incorporated
Subsidiary of Cleveland Pneumatic Co.
2800 East 33rd Street
Cleveland, Ohio 44115
216 / 241-5913

RECEIVED
OHIO EPA
NOV 23 1983
DIV. HAZARDOUS
MATERIALS MANAGEMENT

Title: Metals Applied, Inc. Hazardous Waste Storage Facility Closure Plan

Reference: Subpart G of Part 265 - Interim Status Standards for Owners and Operators of Hazardous Waste T.S.D. Facilities

I. 265.110 Applicability
(a) Sections 265.111-265.115 (Which concern closure) apply to Metals Applied, Inc.

II. 265.111 Closure Performance Standard
(a) Metals Applied, Inc. will close the facility in a manner that minimizes the need for further maintenance.

III. 265.112 Closure plan; amendment of plan
(a) Metals Applied, Inc. will keep a copy of the closure plan and all revisions to the plan at the facility until closure is completed and certified in accordance with 265.115. The following plan will identify the steps necessary to completely or partially close the Metals Applied, Inc. storage facility at any point during its intended operating life and to completely close the facility at the end of its intended operating life:

(1) The basis for interim status as a storage facility at Metals Applied, Inc. is that portable containers holding hazardous waste are stored or accumulated for a period of time exceeding 90 days. Closure will begin with the off-site shipment of those hazardous waste containers exceeding the 90 day storage and accumulation period to an E.P.A. approved T.S.D. facility.

(2) The maximum inventory of wastes in storage at any time during the life of the Metals Applied, Inc. facility will be 200 containers.

(3) Facility equipment (drum pumps, hoses, shovels, absorbent material, gloves, masks, aprons, boots, etc.) used during closure will either be discarded and containerized or decontaminated using E.P.A. approved methods where applicable (See attached decontamination procedures).

(4) An estimate of the expected year of closure for the Metals Applied, Inc. storage facility is 2000. The schedule for final closure will include the following general intervening closure activities and time estimates:

(a) Locate E.P.A. approved T.S.D. facility for the particular hazardous waste(s) - 30 days
(b) Waste sample collection, shipment, analysis/ verification, waste product survey, E.P.A. approval - 30 days.
(c) Locate E.P.A. approved transporter, pre-transport requirements, obtain shipment date, administrative requirements - 30 days.

The total estimated time required to close the Metals Applied, Inc. facility would be 90 days based on the above general activities and time estimates.

(b) Metals Applied, Inc. will amend the closure plan whenever changes in operating plan or facility design affect the closure plan. The plan must be amended within 60 days of the change.

(c) Metals Applied, Inc. will submit the closure plan to the Regional Administrator at least 180 days before the date the company expects to begin closure. Metals Applied Inc. must submit the closure plan to the Regional Administrator no later than 15 days after:
(1) Termination of interim status (except when a permit is issued to the facility simultaneously with termination of interim status; or
(2) issuance of a judicial decree or compliance order under Section 3008 of RCRA to cease receiving wastes or close.

(Comment: The date when closure commences should be within 30 days after the date on which Metals Applied expects to receive the final volume of wastes.)

(d) The Regional Administrator will provide Metals Applied Inc. and the public, through a newspaper notice, the opportunity to submit written comments on the plan and request modifications of the plan within 30 days of the date of notice. He will also, in response to a request or at his own discretion, hold a public hearing whenever such a hearing might clarify one or more issues concerning a closure plan. The Regional Administrator will give public notice of the hearing at least 30 days before it occurs. (Public notice of the hearing may be given at the same time as notice of the opportunity for the public to submit written comments, and the two notices may be combined.) The Regional Administrator will approve, modify, or disapprove the plan within 90 days of its receipt. If the Regional Administrator does not approve

the plan, Metals Applied must modify the plan or submit a new plan for approval within 30 days. The Regional Administrator will approve or modify this plan in writing within 60 days. If the Regional Administrator modifies the plan, this modified plan becomes the approved closure plan. The Regional Administrator's decision must assure that the approved closure plan is consistant with 265.111, 265.113, 265.114 and 265.115. A copy of this modified plan must be mailed to Metals Applied.

IV. 265.113 Closure; time allowed for closure

(a) Within 90 days after receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, Metals Applied must remove from the site all hazardous wastes in accordance with the approved closure plan. The Regional Administrator may approve a longer period using the procedures under 265.112(d) if Metals Applied, Inc. demonstrates that:

(1)(i) The activities required to comply with this paragraph will, of necessity, take the company longer than 90 days to complete; or

(ii)(A) The facility has the capacity to receive additional wastes;

(B) There is a reasonable likelihood that a person other than Metals Applied will recommence operation of the site; and

(C) Closure of the facility would be imcompatible with continued operation of the site; and

(2) Metals Applied has taken and will continue to take all steps to prevent threats to human health and the environment.

(b) Metals Applied, Inc. must complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan, if that is later. The Regional Administrator may approve a longer closure period using the procedures under 265.112(c) if Metals Applied, Inc. demonstrates that;

(1)(i) The closure activities will, if necessity, take Metals Applied longer than 180 days to complete; or

(ii)(A) The facility has the capacity to receive additional waste;

(B) There is a reasonable likelihood that a person other than Metals Applied, Inc. will recommence operation of the site;

(C) Closure of the facility would be incompatible with continued operation of the site; and

(2) Metals Applied, Inc. has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility.

(Comment: Under paragraphs (a)(1)(ii) and (B)(1)(ii), of this Section, if operation of the facility is recommenced, the Regional Administrator may defer completion of closure activities until the new operation is terminated.)

V. 265.114 Disposal or decontamination of equipment

When closure is completed, all facility equipment and structures must have been properly disposed of, or decontaminated by removing all hazardous waste and residues. (See attached)

VI. 265.115 Certification of closure

When closure is completed, Metals Applied, Inc. will submit to the Regional Administrator certification both by Metals Applied and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

Pneumo Corporation
4800 Prudential Tower | Boston, Massachusetts 02199
617 | 262-9300

United States Environmental
Protection Agency
Region V
RCRA Activities
Attention: Financial Requirements
P.O. Box A3587
Chicago, IL 60690

Re: Metals, Applied, Inc.
EPA ID NO. OHD 004173621

Gentlemen:

I am the Chief Financial Officer of Pneumo Corporation which has its principal offices at 4800 Prudential Tower, Boston, Massachusetts 02199. Pneumo owns all of the capital stock of Cleveland Pneumatic Company which, in turn, owns all of the capital stock of Metals Applied, Inc., an Ohio corporation, with its principal office and plant located at 2800 E. 33rd Street, Cleveland, Ohio 44115, hereinafter referred to as "MAI". This letter is in support of MAI's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by this test are shown for each facility: NONE

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

   Metals Applied, Inc., 2800 E. 33rd Street,
   Cleveland, Ohio 44115

   Closure Estimate: $20,000 Post-Closure Estimate: $-0-

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: NONE

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE

This firm is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on November 30. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended November 30, 1982 (comprising Pneumo Corporation, its operating division and all subsidiaries):

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)	$ 20,000
*2.	Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4)	289,541,000
*3.	Tangible net worth	100,300,000
*4.	Net worth	108,007,000
*5.	Current assets	256,766,000
*6.	Current liabilities	124,325,000
7.	Net working capital (line 5 minus line 6)	132,441,000
*8.	The sum of net income plus depreciation, depletion and amortization	38,159,000
*9.	Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	-

		Yes	No
10.	is line 3 at least $10 million?	X	
11.	is line 3 at least 6 times line 1?	X	
12.	is line 7 at least 6 times line 1?	X	
*13.	Are at least 90% of firm's assets located in the U.S.? If not, complete line 14.	X	
14.	is line 9 at least 6 times line 1?	-	
15.	is line 2 divided by line 4 less than 2.0?		X
16.	is line 8 divided by line 2 greater than 0.1?	X	
17.	is line 5 divided by line 6 greater than 1.5?	X	

United States Environmental
Protection Agency

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

PNEUMO CORPORATION

By: _____
David J. Ruggles
Vice President and
Chief Financial Officer

February , 1983

02-18-0498

Metals Applied
Incorporated
Subsidiary of Cleveland Pneumatic Co.
2800 East 33rd Street
Cleveland, Ohio 44115
216 / 241-5913

November 15, 1983

Thomas E. Crepeau, Manager
Permits and Manifest Records Section
Division of Hazardous Materials Management
Ohio EPA
361 East Broad Street
Columbus, Ohio 43216-1049

Dear Mr. Crepeau:

Pursuant to OAC Rules 3745-56-01 to 3745-56-06 and 40 CFR, Sections 265.110 to 265.115, Metals Applied, Inc. is requesting the termination of our Hazardous Waste Facility Installation and Operation Permit (Permit No. 02-18-0498). The attached closure plan and decontamination procedures will document the proposed closure proceedings.

This request concerns the storage of hazardous waste only, Metals Applied, Inc. will continue to be a generator of hazardous waste(s).

The proposed closure schedule is as follows:

December 16, 1983 - the planned completion date for removing all hazardous waste(s) that have exceeded the 90 day accumulation/storage period.

December 31, 1983 - the planned date for the completing of facility equipment decontamination proceedings and final facility closure.

If you have any further questions regarding the closure plan or decontamination procedures, please contact Drew Koler at (216) 241-5913.

Sincerely,

Pablo Prieto
Vice President
Manufacturing

PP/mk

Ernst & Whinney

200 Clarendon Street
Boston, Massachusetts 02116

617/266-2000

Pneumo Corporation
Boston, Massachusetts

We have examined the consolidated balance sheet of Pneumo Corporation and subsidiaries as of November 30, 1982, and the related consolidated statements of earnings, changes in financial position and stockholders' equity for the year then ended, and have issued our report thereon dated January 14, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have compared the information in Items 2 through 17 of a letter dated January 24, 1983 from David J. Ruggles, Vice President and Chief Financial Officer of Pneumo Corporation, to the United States Environmental Protection Agency with the consolidated financial statements mentioned above. In connection with that procedure, nothing came to our attention which caused us to believe that the information should be adjusted.

This report is solely for filing with the United States Environmental Protection Agency, and is not intended for any other purpose.

Ernst & Whinney

Boston, Massachusetts
January 27, 1983

Ernst & Whinney

200 Clarendon Street
Boston, Massachusetts 02116

617/266-2000

Board of Directors and Stockholders
Pneumo Corporation
Boston, Massachusetts

We have examined the consolidated balance sheet of Pneumo Corporation and subsidiaries as of November 30, 1982 and 1981, and the related consolidated statements of earnings, changes in financial position and stockholders' equity for each of the three years in the period ended November 30, 1982. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the consolidated financial position of Pneumo Corporation and subsidiaries at November 30, 1982 and 1981, and the consolidated results of their operations and changes in their financial position for each of the three years in the period ended November 30, 1982, in conformity with generally accepted accounting principles applied on a consistent basis.

Ernst & Whinney

Boston, Massachusetts
January 14, 1983

INTER-OFFICE COMMUNICATION

TO: Distribution DATE: Feb. 1, 1984

FROM: Tom Carlisle, Mgr., TA&WM Section, DHMM

SUBJECT: Metals Applied "Closure", #02-18-0498, OHD004173621 G, TSD, PA

The referenced facility submitted a closure plan to Ohio EPA on November 15, 1983. The proposed closure was for the container (drum) storage area included in their federal Part A filing and included in their state permit. What the facility proposed to do was ship their accumulated waste off-site and then retain use of the storage area for less than 90 day storage. Since the facility had successfully completed the majority of the inventory reduction by the time of the closure submission, it was determined by Ohio EPA that formal closure plan processing was not necessary. On January 9, 1984, Ohio EPA received closure certifications from the facility. On January 24, 1984, Rod Beals of NEDO inspected the facility and found that the facility was in compliance with the generator regulations and appeared to be capable of limiting drum storage to less than 90 days.

The facility is therefore a candidate for withdrawal of their state permit.

The current status of the facility is that of a generator and container storage for less than 90 days. P&MR Section should officially notify the U.S. EPA of the facility's status as soon as possible.

TC/jw

Attachments

Distribution:
Tim Lawrence, ES, DHMM, (w/o attachments)
Tom Crepeau, P&MRS, DHMM
Rod Beals, NEDO

C.2 Compliance and Enforcement

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
FAX (216) 487-0769

TRACI · DHWM, CM&ES
TO GO ON: ✓ RCRIS ✓ DBASE __ FO LOG __ USEPA LOG __ CJ LOG
ENTERED: ✓ RCRIS ✓ DBASE __ FO LOG __ USEPA LOG __ CJ LOG
RCRIS ENTRY CODES: (EVALULATION) 001 (ENFORCEMENT) _____
CEI ✓ CI __ OTHER _____ INITIAL NOV __ FOLLOW-UP NOV __
FULL RTC __ PRTL RTC __ TCLP ✓ LDR ✓ SENT TO USEPA: YES __ NO __

Donald R. Schregardus
Director

March 20, 1992

CERTIFIED MAIL

RE: METALS APPLIED INC
CUYAHOGA COUNTY
OHD 004 173 621

Mr. John R. Owens
Metals Applied, Inc.
2800 East 33rd Street
Cleveland OH 44115

NOTICE OF VIOLATION

Dear Mr. Owens:

On March 9, 1992, Murat Tukel and I, representing the Ohio EPA, conducted a complaint inspection and an inspection for compliance with hazardous waste regulations at the Metals Applied Incorporated facility in Cleveland. Mr. John Callo and you represented the Metals Applied Incorporated facility.

The facility plates aircraft landing gear parts. During the course of the inspection, the following hazardous waste streams were identified:

1) F006 sludge from a waste water pretreatment system manifested off site to Chem Met Services of Wyandotte, MI.
2) D006, D008 spent aluminum oxide powder from a sand blasting operation manifested off site to Chem Met Services of Wyandotte, MI.
3) D006, F007 spent titanium cadmium cyanide solution from a plating operation manifested off site to Cyanokem of Detroit, MI.
4) F007, F008 spent copper cyanide solution from a plating operation manifested off site to Cyanokem of Detroit, MI.
5) D003 spent electroless nickel solution from a plating operation manifested off site to Cyanokem of Detroit, MI.
6) D002, D006, D007, D008 spent sulfuric and hydrofluoric acid mixture from a plating operation manifested off site to Cyanokem of Detroit, MI.
7) D002 spent nitric acid from a plating operation manifested off site to Cyanokem of Detroit, MI.
8) D002, D006, D007 spent chromium strip solution from a plating operation manifested off site to Cyanokem of Detroit, MI.
9) D002, D006 spent nickel sulfamate solution from a plating operation manifested off site to Cyanokem of Detroit, MI.

10) D003, D006, D008, D009 waste cyanide solids manifested off site to Cyanokem of Detroit, MI.
11) D002, D006, D007, D008 waste sodium hydroxide manifested off site to Dynecol of Detroit, MI.
12) D002, D006, D007, D008 chromium pit waste manifested off site to Dynecol of Detroit, MI.
13) D006, D008 spent aluminum oxide powder from a sand blasting operation manifested off site to Michigan Disposal of Belleville, MI.
14) F006 sludge from a waste water pretreatment system manifested off site to Michigan Disposal of Belleville, MI.
15) D006, D008 spent steel shot from a shot peening operation manifested off site to Michigan Disposal of Belleville, MI.
16) F001, D040 spent trichloroethene from a degreasing operation manifested off site to Northeast Chemical of Cleveland, OH.
17) D001, F003, F005 spent xylene from parts washing operations and from masking paint spray gun cleaning operations manifested off site to Northeast Chemical of Cleveland, OH.
18) D006 spent paint booth filters manifested off site to Northeast Chemical of Cleveland, OH.
19) F001, D040 waste trichloroethene from degreasing operations manifested off site to Petro-Chem of Detroit, MI.

The facility was inspected as a large quantity generator for compliance with the applicable hazardous waste regulations. A copy of our check sheets are enclosed for your information.

The inspection appears to have satisfied the allegations made in the complaint. However, the inspection revealed that the facility is in violation of the following regulations:

Violations

1) The facility is accumulating hazardous waste in containers. The facility failed to mark each container clearly with the words "Hazardous Waste" in violation of OAC 3745-52-34 (A) (3). One container of F006 sludge outside the cadmium plating area, one container of flammable solid and four containers of spent trichloroethene in the flammable storage area were not labelled. These containers were labelled properly prior to the Ohio EPA departing from the site, and the facility is considered to have returned to compliance on this violation. The facility shall ensure that the labelling regulations are strictly adhered to in the future.

2) The facility failed to mark each container of hazardous waste clearly with the accumulation date in violation of OAC 3745-52-34 (A) (2). One container of F006 sludge outside the cadmium plating area, one container of flammable solid and four containers of spent trichloroethene in the flammable storage area were not labelled. These containers were labelled properly prior to the Ohio EPA departing from the site, and the facility is considered to have returned to compliance on this violation. The facility shall ensure that the labelling regulations are strictly adhered to in the future.

3) The facility has numerous satellite accumulation areas. The facility failed to mark all of the containers with the words "Hazardous Waste" or other words identifying the contents in violation of OAC 3745-52-34 (C). One drum outside the glass bead area and one drum in front of chromium rinse tank number nine were not correctly labelled. These drums were properly labelled prior to the Ohio EPA departing from the site.

   The roll off box used to collect the F006 filter cake sludge also did not have the words "Hazardous Waste" clearly marked on it. The facility shall properly label this container, and document compliance by sending a photograph of the properly labelled container to the Ohio EPA's North East District Office.

4) Upon accumulating greater than 55 gallons of hazardous waste at a satellite accumulation point, the facility failed to mark the container with the date of accumulation in violation of 3745-52-34. The facility is marking the date the drums first begin to be filled at each satellite accumulation point. The facility must instead mark the date that the drum is filled. The facility shall ensure that correct practices for the labelling of accumulation dates are followed, and document compliance by sending a narrative of how the facility intends to accomplish this (eg: documentation of a training program) to the Ohio EPA's North East District Office.

5) The facility has failed to record weekly inspections of required spill control and decontamination equipment, fire and communications equipment in an inspection log or summary in violation of OAC 3745-65-33 (B). The facility has failed to enter into such records the date and time of the inspection, the name of the inspector, notation of observations made and date and nature of any repairs or remedial actions in violation of OAC 3745-65-33 (B).

The facility shall begin keeping such a log immediately. The facility shall demonstrate compliance by sending a copy of the inspection record, along with the results of at least two weekly inspections, to the Ohio EPA's North East District Office.

6) The facility has failed to record weekly inspections of the area where containers are stored for evidence of leaks or corrosion in an inspection log or summary in violation of OAC 3745-66-74 (B). The facility has failed to enter into such records the date and time of the inspection, the name of the inspector, notation of observations made and date and nature of any repairs or remedial actions in violation of OAC 3745-66-74 (B).
The facility shall begin keeping such a log immediately. This log may be combined with the log required under violation number five. The facility shall demonstrate compliance by sending a copy of the inspection record, along with the results of at least two weekly inspections, to the Ohio EPA's North East District Office.

7) The facility failed to have a written contingency plan which contains a list of all emergency equipment including location, physical description and outline of capabilities in violation of OAC 3745-65-52 (E). The facility has this information referenced as a figure, but the information is not included with the plan. The facility shall add this information to the contingency plan. The facility shall document compliance by sending a copy of the required information to the Ohio EPA's North East District Office.

8) The facility failed to have a written contingency plan which contains an evacuation plan for facility personnel in violation of OAC 3745-65-52 (F). The facility has this information referenced as a figure, but the information is not included with the plan. The facility shall add this information to the contingency plan. The facility shall document compliance by sending a copy of the required information to the Ohio EPA's North East District Office.

9) The facility failed to submit revisions to the contingency plan to all state and local emergency service authorities that may be required to participate in the execution of the plan in violation of OAC 3745-65-53 (A) (B). The facility shall submit the March, 1992 revision to the appropriate authorities. The facility shall document compliance (eg: by sending copies of both sides of a 'return receipt requested' certified mail card containing all appropriate signatures) to the Ohio EPA's North East District Office.

10) The facility failed to store containers of hazardous waste closed except when it is necessary to add or remove waste in violation of OAC 3745-66-73 (A). The facility had open drums present in the copper plating area (one drum), the shot peen area by the small blasting machine (one drum), the shot peen area near a large shipping door (one drum), the aluminum oxide grit blast area (one drum), the grit blast area near the large grit blast machines (two drums), the rear of the shot blast area (one drum), the glass bead area (one drum), the masking area labelled 'paint filters' (one drum), the cadmium plating area (one drum), the chromium plating area in front of chromium rinse tank number nine (one drum), and the degreasing tank area (one drum). These containers were closed properly prior to the Ohio EPA departing from the site. The facility shall ensure that the containers are kept closed in a manner that will prevent spillage if the drum is upset in the future.

The facility had a few open drums continuously collecting spent blasting material off of grit blasting or shot peening machines. The facility shall apply a suitable cover or other device to prevent the loss or dispersion of material as these drums are being filled. The facility shall document compliance by sending a description and a photograph of the controls to the Ohio EPA's North East District Office.

The above violations and concerns must be corrected and documentation of all the corrections must be sent to this office to my attention by April 17, 1992.

The facility was evaluated for compliance with the Federal Toxicity Characteristic (TC) rule requirement found in 40 CFR 262.11. In addition, the facility was evaluated for additional Federal requirements related to the management of TC wastes. The TC rule related information obtained during the inspection will be forwarded to the USEPA for review and appropriate follow-up.

Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

If you have any questions, please feel free to contact either Mr. Harry Courtright or me at (216) 963 1200.

Sincerely,

John B. Palmer
Environmental Specialist
Division of Hazardous Waste Management

JP.wb

cc: Harry Courtright, DHWM, NEDO
Laurie Stevenson, DHWM, CO
Cliff Morton, DERR, SIU, CO

RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: METALS APPLIED INC.

USEPA I.D.: OHD 004 173 621 HWFB No.: 02 18 0498

Street: 2800 EAST 33RD STREET

City: CLEVELAND State: OH Zip: 44115

County: CUYAHOGA Telphone: 216 241 5913

Owner/Operator: CLEVELAND PNEUMATIC / (HOLDING COMPANY) PNEUMO ABEX

Street: 3481 EAST 77TH ST

City: CLEVELAND State: OH Zip: 44105

Telephone: 216 341 1700

Inspection Date: 03/09/92 Time: 09 - 10

Advance notice of inspection given? (yes) ____ (no) ✓
If so, how far in advance? ____

	Name	Agency/Title	Phone
Inspectors:	JOHN PALMER	OEPA/ES II	216 425 9171
	MURAT ZUKEL	↓	↓
Facility Representative:	JOHN OWENS	ENVIRONMENTAL COMPLIANCE COORDINATOR	216 241 5913
	JOHN CALLO	DIRECTOR	↓

FOR METALS APPLIED INC.

STATUS

Cond. Exempt SQG ___ SQG ___ Large Quantity Generator ✓
LDR Checklist Attached: (yes) ✓ (no) ____

ACTIVITIES

Containers ✓
Tanks ___
Wastepile ___
Landfill ___
Surface Impoundment ___
Used oil burner ___
Hazardous waste fuel burner/blender ___
Incineration/Thermal treatment ___
Land treatment ___
Groundwater monitoring ___

Revised: 1/7/91

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handing procedures:

FACILITY ~~MANUFACTO~~ IS A PLATER OF AIRCRAFT LANDING GEAR PRODUCTS. HAS ONE CHROMIUM LINE, 2 CAMIUM PLATING TANKS, 1 COPPER TANK & 3 NICKEL TANKS. PRETREATMENT SYSTEM IS PRESENT & PRODUCING SLUDGE. WASTES GENERATED ALSO INCLUDE SPENT PLATING BATH SOLUTIONS & DEGREASER (TCE) WASTES & SLUDGES. SEE TABLE FOR DETAILS. ALSO SPENT SHOT BLAST MATERIALS.

* SLUDGES FROM ON-SITE STILL FOR RECLAMATION (STILL BOTTOMS)

FACILITY HAS NUMEROUS SATELLITE ACCUMULATION AREAS. MANY OF THE DRUMS WERE OPEN, AND SOME WERE W/O LABELS.

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

   (yes) _____ (no) ✓

   If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the **Conditionally Exempt Small Quantity Generator Requirements** checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

   (yes) _____ (no) ✓

   If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the **Small Quantity Generator Requirements** checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

   OR;

   b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

   (yes) ✓ (no) _____

   If so, the facility is classified as a Large Quantity Generator. Please complete the **Large Quantity Generator Requirements** checklist.

REMARKS - GENERATOR CLASSIFICATION

FACILITY INSPECTION
WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE			ON SITE MANAGEMENT											OFF SITE MANAGEMENT
EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR: LESS THAN 90 DAYS	GENERATOR: LESS THAN 180 DAYS	GENERATOR: LESS THAN 270 DAYS	TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLED	CONTAINER	IMPOUNDMENT	TANK	WASTE PILE	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT
D006	1000 #	WASTEWATER TREATMENT	✓						✓					TO CHEM MET SERVICES WYANDOTTE, MI
D006 D008	670 #	ALUMINUM OXIDE BLASTING												
D006 F007	270 GAL	Ti Cd CYANIDE SOLUTION	✓						✓					CYANOKEM DETROIT, MI
F007 F008	170 GAL	Cu CYANIDE SOLUTION												
~~D008~~ D003	400 GAL	ELECTROLESS Ni SOLUTION							✓					
D002, D007 D006, D008	270 GAL	SPENT H_2SO_4 / HF	✓						✓					
D002	75 GAL	SPENT HNO_3							✓					
D002, D006 D007	260 GAL	CHROME STRIP SOLUTION	✓						✓					
D002, D006 D007	150 GAL	Ni SULFAMATE							✓					
D006 D009	1000 #	WASTE CN, DRY	✓						✓					
D002, D006 D007, D008	100 GAL	NaOH	✓						✓					DYNECOL DETROIT, MI
↓	1000 GAL	CHROME PIT												
~~D006~~ D006 D008	19000 #	ALUMINUM OXIDE DUST	✓						✓					MICHIGAN DISPOSAL BELLEVILLE, MI
F006	2800 #	WWTP SLUDGE												
D006 D008	11000 #	STEEL SHOT												
F001, D040	60 GAL	SPENT TCE - DEGREASE	✓						✓					NORTHEAST CHEMICAL CLEVELAND OH
D001, F003 F005	10 GAL	SPENT XYLENE PAINTS WASH PAINT												
D006	70 #	SPENT PAINT FILTERS	✓						✓					PETRO-CHEM DETROIT MI
F001 1,1,1 CALIMO		WASTE TCE DEGREASING	✓						✓					

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11) **Y/N/NA** **RMK #**

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A)(B) and (C)? Y

   If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04? N

   If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06? N

   If so, please identify these waste streams below:

	Y/N/NA	RMK #
4. Is the generator recycling any materials on-site by:		
a. Using or reusing the material as an ingredient in an industrial process to make a product?	N	
i. If so, is the material being reclaimed before it is used or reused?	N/A	
b. Using the material as a substitute for commercial products?	N	
c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?	N	
i. If so, is the material reclaimed before returning to the original process?	N/A	

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?	Y	

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

HAS A PRETREATMENT SYSTEM IN OPERATION FOR WASTE WATERS. SLUDGE PRODUCED IS F006, & NOT EXEMPT

6. Are Land Disposal Restricted (LDR) wastes being generated? If so, complete the **Land Disposal Restriction Checklist**.	Y	

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

7. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from USEPA as required by 3745-52-12?	Y	

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

8. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?	Y	

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57 AND OAC 3745-52-60)	Y/N/NA	RMK #
9. Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 through 3745-52-57 and 3745-52-60?	N/A	

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)	Y/N/NA	RMK #
10. Does the generator meet the following pre-transport requirements prior to offering hazardous wastes for transport off-site:		
a. The waste material is packaged, labeled, and marked in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32]?	Y	
b. Each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32?	Y	
c. The generator meets the requirements for proper DOT placarding or offers the appropriate DOT placards to the initial transporter in compliance with 3745-52-33?	Y	

REMARKS - PRETRANSPORT REQUIREMENTS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23) Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:

   a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20(A)? Y ____

   b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22? Y ____

   c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E)? Y ____

   d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A)(1)(2)? Y ____

2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter? Y ____

   a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42? Y ____

3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40? Y ____

REMARKS - MANIFEST REQUIREMENTS

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS (OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

   a. The containers or tanks are clearly marked with the words "Hazardous Waste"? [OAC 3745-52-34(A)(3)] — N — (1) (2)

   b. The date that accumulation began is clearly marked on each container? [OAC 3745-52-34(A)(2)] — N — (2)

In addition, OAC 3745-52-34(A)(1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete **Management of Containers** checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks? — N

   If so, OAC 3745-52-34(A)(1) requires generators to comply with Rules 3745-66-90 to 3745-66-992 except Paragraph (c) of rule 3745-66-97 and rule 3745-66-991.

   If the generator is accumulating hazardous waste(s) in tanks, complete the **Storage and Treatment in Tanks** checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days? — N

   a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days? — N/A

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

(1) OPEN DRUMS PRESENT IN Cu PLATING AREA (1), SHOT PEEN AREA BY SMALL MACHINE (1), SHOT PEEN AREA NEAR SHIPPING DOOR (1), ALUMINUM OXIDE GRIT BLAST AREA (1), LARGE GRIT BLAST MACHINES (2), REAR OF SHOT BLAST AREA (1), OUTSIDE GLASS BEAD AREA (1), MASKING AREA 'PAINT' FILTERS (1), Cd PLATING AREA (1), IN FRONT OF Cr RINSE TANK #9 BY DEGREASER TANK (1)

(2) UNLABELLED DRUMS PRESENT OUTSIDE GLASS BEAD AREA, NEXT TO Cd PLATING AREA (FOOG), IN FRONT OF CHROME RINSE #9. RTC WHILE WE WERE ON SITE.

FLAMMABLE STORAGE AREA: "FLAMMABLE SOLID" — NO ACCUM DATE

4 DRUMS SPENT TCE — NO LABELS OR DATE

ALSO SEE SATELLITE ACCUMULATION CHECKSHEET

SATELLITE ACCUMULATION AREA REQUIREMENTS (OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation) — Y

   If so, are the following requirements of OAC 3745-52-34(C) being met:

   a. Quantities of waste accumulated do not exceed 55 gallons at any time? — Y
   b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? — N/A
   c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container? — N (1)

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the **Use and Management of Containers** checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b? — Y

   a. If so, did the generator comply with 3745-52-34(A) within three (3) days? **and;** — ~~Y~~ N (2)

   b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating? — N (2)

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

(1) SEE REMARK # 2 "GENERATOR ACCUMULATION IN CONTAINERS & TANKS"

(2) FACILITY IS MARKING DATE WHEN THEY FIRST START FILLING THE DRUM.

NB: HOPPER FOR WWTP SLUDGE DOES NOT HAVE "HAZARDOUS WASTE" ON IT

PERSONNEL TRAINING (OAC 3745-65-16)	Y/N/NA	RMK #
1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A)(4)]	Y	
2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A)(4)]	Y	
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A)(4)]	Y	
4. Does the generator keep all the records required by 3745-65-16(D)(E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)]	Y	

REMARKS - PERSONNEL TRAINING REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)	Y/N/NA	RMK #
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]	Y	
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?	Y	#1
a. If yes, was the contingency plan implemented? [3745-65-51(B)]	Y	
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]		
a. Internal alarm system?	N/A	
b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
c. Portable fire control equipment, spill control and decontamination equipment?	Y	
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	N	
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]	Y	
a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs?	N	
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]	Y	
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]	Y	
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]	Y	

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [OAC 3745-65-37(B)] — N

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

#1 - On December 29, 1991, an acid spill occurred in shot blast area. Acid was sulphuric ~~hydrochloric~~ & HYDROFLUORIC and the contingency plan was implemented internally. No off-site emergency authorities been contacted.

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)	Y/N/NA	RMK #
1. Does the o/o have a written Contingency Plan which contains the following? [3745-65-52(A)(B)(C)(D)(E)]:		
a. Actions to be taken by personnel in the event of an emergency incident?	Y	
b. Arrangements or agreements with local or state emergency authorities?	Y	
c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?	Y	
(d.) A list of all emergency equipment including location, physical description and outline of capabilities? E	N	#1
(e.) If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]?	N	#1
2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)]	Y	
(3.) Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)]	N	#2
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54]	Y	
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55]	Y	

Y/N/NA RMK #

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)? y

REMARKS - CONTINGENCY PLAN REQUIREMENTS

#1 - The maps for emergency equipment and evacuation routes are missing in the contingency plan. It was refered in the text as fig A & B, but not attached with contingency plan.

#2 - Last revision for contingency plan was made 03/92. The copies of this plan haven't been sent out yet.

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)	Y/N/NA	RMK #
1. Are hazardous wastes stored in containers which are:		
a. Closed? [3745-66-73(A)]	N	(1)
b. In good condition? [3745-66-71]	Y	
c. Compatible with wastes stored in them? [3745-66-72]	Y	
(2.) Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]	N	(1)
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]	Y	
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]	Y	
(5.) Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:		
a. Date and time of inspections?	N	
b. Name of inspector?	N	
c. Notation of observations made during the inspection?	N	
d. The date and nature of any repairs or other remedial action?	N	
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,	Y	
a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Y	
b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]	Y	

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

(1) SEE REMARK # 1 ON "GENERATOR ACCUMULATION IN CONTAINERS & TANKS"

OAC CHAPTER 3745-59 (40 CFR PART 268) - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS — Y/N/NA — RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA in accordance with O.A.C. Rule 3745-59-05 (40 CFR 268.5)? If yes, — N

   (a) List the waste(s) affected:

   (b) Has such an extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)] — N/A

   (c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from an LDR treatment standard by US EPA as allowed by O.A.C. Rule 3745-59-44 (40 CFR 268.44)? If yes, — N

   (a) List the waste(s) affected:

   (b) Has the petition been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)] — N/A

NOTE: Until the extension or variance identified in Questions 1 or 2 has been recognized by the Director of the Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements. [See O.A.C. Rules 3745-59-05(C) and 3745-59-44(C)]

NO MIGRATION PETITION | Y/N/NA | RMK#

3. Has the entity petitioned US EPA for a variance to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit as specified in O.A.C. Rule 3745-59-06 (40 CFR 268.6)? If yes, — N

   (a) List the waste(s) affected:

   (b) Has the entity's "no migration" demonstration been approved by US EPA? — N/A

NOTE: Until receiving approval of the petition by US EPA, the entity must comply with all LDR requirements applicable to the petitioned waste(s). No approval or recognition of the petition by the Director of the Ohio EPA is required. [O.A.C. Rule 3745-59-06; 40 CFR 268.6]

PROHIBITION AGAINST DILUTION

4. In compliance with O.A.C. Rule 3745-59-03 (40 CFR 268.3), does the entity prohibit the dilution of a restricted waste or treatment residue from a restricted waste:

   (a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Y

   (b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Y

   (c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-33? (40 CFR 268.30 through 268.33) — Y

   (d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA? — Y

NOTE: Dilution of wastes is permissible under the following conditions:

   i. The entity dilutes a characteristic only hazardous waste in a wastewater treatment system which treats wastes subsequently discharged pursuant to a permit issued under section 402 of Clean Water Act or which treats wastes for purposes of pretreatment under section 307 of the Clean Water Act; and,

   ii. No other method of treatment has been specified as the treatment standard for the waste. (See 40 CFR 268.3)

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(C)(3) (40 CFR 261.8(e)(1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS	Y/N/NA	RMK#
1. Has the generator adequately evaluated all wastes generated to determine if the wastes are restricted from land disposal under O.A.C. Chapter 3745-59 (40 CFR Part 268)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
(a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
(b) For determinations based upon analytical testing of the waste: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)?	Y	
3. Has the generator determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	

REMARKS

	Y/N/NA	RMK#
4. Does the generator generate waste mixtures that are subject to two or more different treatment standards? If so,	Y	
(a) For mixed waste streams containing two or more concentration based treatment standards: Has the generator applied the more stringent treatment standard as the treatment standard for the mixture? [O.A.C. Rules 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]	Y	
5. Does the facility generate any listed waste(s) which are restricted from land disposal? If so,	Y	
(a) Do such wastes also exhibit hazardous waste characteristics as identified in 40 CFR 262.11?	Y	
(b) For listed wastes which also exhibit characteristic(s), does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [40 CFR 268.9]	Y	

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

6. Does the generator treat any characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous? If so,	N	
(a) Are treated waste(s) sent to a licensed solid waste disposal facility? If so,	N/A	
i. With each shipment of waste, does the generator submit a notification and certification to the Regional Administrator which contains the following information:		
a. Name and address of the solid waste facility receiving the waste? [40 CFR 268.9(d)(1)(i)]		
b. A description of the waste as initially generated, including EPA hazardous waste numbers and the treatability group? [40 CFR 268.9(d)(1)(ii)]		
c. The treatment standards applicable at the initial point of generation? [40 CFR 268.9(d)(1)(iii)]		
ii. Is the certification signed by an authorized representative and does it contain the language in 40 CFR 268.7(b)(5)(i)? [40 CFR 268.9(d)(2)]		

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

NOTIFICATION/CERTIFICATION	Y/N/NA	RMK#
7. For wastes that do not meet treatment standards: Does the generator notify the treatment or storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]	Y	
(a) Is such notification provided with each shipment of waste? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]	Y	
(b) Does the notification contain the following information:		
i. EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(1)(a); 40 CFR 268.7(a)(1)(i)]	Y	
ii. Appropriate treatment standard for each waste? [O.A.C. Rule 3745-59-07(A)(1)(b); 40 CFR 268.7(a)(1)(ii)]	Y	
iii. The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(1)(c); 40 CFR 268.7(a)(1)(iii)]	Y	
iv. Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d); 40 CFR 268.7(a)(1)(iv)]	Y	
8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the waste stating that the wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A)(2); 40 CFR 268.7(a)(2)]	N/A	
If so, does the notice include the following information:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(2)(a)(i); 40 CFR 268.7(a)(2)(i)(A)]		
(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(ii); 40 CFR 268.7(a)(2)(i)(B)]		
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(iii); 40 CFR 268.7(a)(2)(i)(C)]		
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(2)(a)(iv); 40 CFR 268.7(a)(2)(i)(D)]		
(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A)(2)(b); 40 CFR 268.7(a)(2)(ii)]		

	Y/N/NA	RMK#
9. For wastes subject to a case-by-case extension, an exemption or a variance: Does the generator provide a written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07(A)(3); 40 CFR 268.7(a)(3)]	N/A	
If so, does the notice contain the following information:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(3)(a); 40 CFR 268.7(a)(3)(i)]		
(b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(b); 40 CFR 268.7(a)(3)(ii)]		
(c) The manifest number associated with the shipment of waste? [O.A.C. 3745-59-07(A)(3)(c); 40 CFR 268.7(a)(3)(iii)]		
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(3)(d); 40 CFR 268.7(a)(3)(iv)]		
(e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(e); 40 CFR 268.7(a)(3)(v)]		
10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [3745-59-07(A)(6); 40 CFR 268.7(a)(6)]		

REMARKS

TOXICITY CHARACTERISTIC (TC) RULE REQUIREMENTS

WASTE EVALUATION (GENERATOR REQUIREMENT)	Y/N	N/A	RMK#
1. Has the generator evaluated all wastes to determine if they exhibit any of the toxicity characteristics as defined in 40 CFR 262.24? [40 CFR 262.11]	Y		
(a) Did the generator use knowledge of the process to determine if wastes exhibit any of the toxicity (TC) characteristics? OR;	Y		
(b) Did the generator obtain a chemical analysis of the wastes to determine if the wastes demonstrate any of the toxicity (TC) characteristics?	Y		

NOTE: If the generator has obtained a chemical TC analysis of the wastes, please attach a copy of the analytical results to this checklist.

2. Please identify which of the following TC wastes are being managed at the facility:

TC METAL WASTES

___ D004 (Arsenic)	✓ D007 (Chromium)	___ D010 (Selenium)
___ D005 (Barium)	✓ D008 (Lead)	___ D011 (Silver)
✓ D006 (Cadmium)	✓ D009 (Mercury)	

TC PESTICIDE WASTES

___ D012 (Endrin)	___ D014 (Methoxychlor)	___ D016 (2,4-D)
___ D013 (Lindane)	___ D015 (Toxaphene)	___ D017 (2,4,5-TP)

TC ORGANIC WASTES

___ D018 (Benzene)	___ D031 (Heptachlor)
___ D019 (Carbon tetrachloride)	___ D032 (Hexachlorobenzene)
___ D020 (Chlordane)	___ D033 (Hexachlorobutadiene)
___ D021 (Chlorobenzene)	___ D034 (Hexachloroethane)
___ D022 (Chloroform)	___ D035 (Methyl ethyl ketone)
___ D023 (o-Cresol)	___ D036 (Nitrobenzene)
___ D024 (m-Cresol)	___ D037 (Pentrachlorophenol)
___ D025 (p-Cresol)	___ D038 (Pyridine)
___ D026 (Cresol)	___ D039 (Tetrachloroethylene)
___ D027 (1,4-Dichlorobenzene)	✓ D040 (Trichloroethylene)
___ D028 (1,2-Dichloroethane)	___ D041 (2,4,5-Trichlorophenol)
___ D030 (2,4-Dinitrotoluene)	___ D042 (2,4,6-Trichlorophenol)
	___ D043 (Vinyl chloride)

3. Please identify below, how the facility is managing TC hazardous wastes:

GENERATOR ACCUMULATION (< 90 DAYS)	STORAGE (> 90 DAYS)	ON-SITE TREATMENT	ON-SITE DISPOSAL
✓ Container	___ Container	___ Tank	___ Injection Well
___ Tank	___ Tank	___ Incinerator	___ Surface Impoundment
	___ Waste Pile	___ Other	___ Land Application
	___ Surface Impoundment		

PART A APPLICATION REQUIREMENTS	Y/N	N/A	RMK#
4. For TSD facilities: Does the company have available, a copy of its Part A permit application which has been revised to reflect TC waste codes?		N/A	___
If so, please obtain a copy and attach to this checklist.			
5. If the company does not have a revised Part A available, does the facility representative indicate that a revised Part A application has been filed with U.S. EPA?		N/A	___
RECORDKEEPING REQUIREMENTS			
6. Is the owner/operator in compliance with the 40 CFR Part 264 and Part 265 recordkeeping requirements applicable to the management of TC waste?	Y		___

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

TOXICITY CHARACTERISTIC (TC) RULE REQUIREMENTS

WASTE EVALUATION (GENERATOR REQUIREMENT)	Y/N	N/A	RMK#
1. Has the generator evaluated all wastes to determine if they exhibit any of the toxicity characteristics as defined in 40 CFR 262.24? [40 CFR 262.11]	Y		
(a) Did the generator use knowledge of the process to determine if wastes exhibit any of the toxicity (TC) characteristics? OR;	Y		
(b) Did the generator obtain a chemical analysis of the wastes to determine if the wastes demonstrate any of the toxicity (TC) characteristics?	Y		

NOTE: If the generator has obtained a chemical TC analysis of the wastes, please attach a copy of the analytical results to this checklist.

2. Please identify which of the following TC wastes are being managed at the facility:

TC METAL WASTES

___ D004 (Arsenic)	✓ D007 (Chromium)	___ D010 (Selenium)
___ D005 (Barium)	✓ D008 (Lead)	___ D011 (Silver)
✓ D006 (Cadmium)	✓ D009 (Mercury)	

TC PESTICIDE WASTES

___ D012 (Endrin)	___ D014 (Methoxychlor)	___ D016 (2,4-D)
___ D013 (Lindane)	___ D015 (Toxaphene)	___ D017 (2,4,5-TP)

TC ORGANIC WASTES

___ D018 (Benzene)	___ D031 (Heptachlor)
___ D019 (Carbon tetrachloride)	___ D032 (Hexachlorobenzene)
___ D020 (Chlordane)	___ D033 (Hexachlorobutadiene)
___ D021 (Chlorobenzene)	___ D034 (Hexachloroethane)
___ D022 (Chloroform)	___ D035 (Methyl ethyl ketone)
___ D023 (o-Cresol)	___ D036 (Nitrobenzene)
___ D024 (m-Cresol)	___ D037 (Pentrachlorophenol)
___ D025 (p-Cresol)	___ D038 (Pyridine)
___ D026 (Cresol)	___ D039 (Tetrachloroethylene)
___ D027 (1,4-Dichlorobenzene)	✓ D040 (Trichloroethylene)
___ D028 (1,2-Dichloroethane)	___ D041 (2,4,5-Trichlorophenol)
___ D030 (2,4-Dinitrotoluene)	___ D042 (2,4,6-Trichlorophenol)
	___ D043 (Vinyl chloride)

	Y/N	N/A	RMK#

STRUCTURAL/OPERATING REQUIREMENTS

7. Is (are) the unit(s) used to manage TC hazardous waste in compliance with the structural and operating requirements of 40 CFR Part 264 and Part 265? Y ___

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

	Y/N	N/A	RMK#

OPERATION/MAINTENANCE REQUIREMENTS

8. Is the owner/operator complying with 40 CFR Part 264 and Part 265 operation and maintenance requirements to ensure the proper management of TC hazardous wastes? Y ___

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

OhioEPA

Re: Hazardous Waste Activity Status
U.S. EPA I.D. No. OHD004173621 G, PA-3, N
Ohio Permit No. 02-18-0498

April 1, 1985

Pablo Prieto
Vice President Manufacturing
Metals Applied Incorporated
2800 E. 33rd Street
Cleveland, Ohio 44115

Dear Mr. Prieto:

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V
HWFB
D.O.

Re: Metals Applied, Inc.
#02-18-0498

G, TSD
OHD 004173621

April 21, 1983

Mr. Drew Koler
Metals Applied, Inc.
2800 East 33rd Street
Cleveland, Ohio 44115

Dear Mr. Koler:

On April 12, 1983, I conducted a reinspection of the Metals Applied, Inc. facility located at 2800 East 33rd Street, Cleveland, Ohio, to determine compliance regarding violations noted during the January 10, 1983, Interim Status Standards inspection. You, Mr. Tim Aish, and Mr. Tom Quatrini represented Metals Applied, Inc. during the reinspection.

The reinspection indicates that Metals Applied, Inc. is in general compliance with the applicable Ohio Hazardous Waste regulations OAC 3745-50 through 3745-58 and Federal Hazardous Waste regulations 40 CFR 260-265.

This inspection report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will be forwarded to Ms. Kathy Homer, U.S. EPA - Region V.

Please feel free to contact our office or Ms. Kathy Homer at (312) 866-7435 if you have any questions.

Yours truly,

Rodney Beals
Environmental Scientist
Division of Hazardous Materials Management

RB:km

cc: Paula Cotter, DHMM, Central Office
Ken Westlake, U.S. EPA - Region V

Northeast District Office
2110 E. Aurora Road, Twinsburg, Ohio 44087-1969 (216) 425-9171

Re: Metals Applied, Inc.
#02-18-0498

Mr. Drew Koler
2800 East 33rd Street
Cleveland, Ohio 44115

January 24, 1983

Dear Mr. Koler:

On January 10, 1983, Deborah Berg and I conducted an inspection of the Metals Applied, Incorporated facility located at 2800 East 33rd Street, Cleveland, Ohio, to determine compliance with both State and Federal hazardous waste regulations. You and Mr. Quatrini represented Metals Applied, Inc. during this inspection. This inspection report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will also be forwarded to Ms. Kathy Homer, U.S. EPA - Region V.

The following violations were noted during this inspection:

1. A Waste Analysis Plan which describes analytical parameters, test methods, sampling methods, testing frequency, and responses to any process changes that may affect the character of the waste is needed (40 CFR 265.13 and 3745-65-13 (B)).

2. During the inspection, you informed us that you are storing 20 drums of hazardous wastes which were left on-site by the previous property owners. A detailed chemical and physical analysis for the 20 drums of waste is needed to characterize the contained waste (40 CFR 265.13 and 3745-65-13 (A)) and documentation is necessary to determine that these wastes are not incompatible with other wastes being stored nearby (40 CFR 265.77 and 3745-66-77).

3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position must be maintained at the facility (40 CFR 265.16 (d) and 3745-65-16).

4. Records must be maintained at the facility including written job titles, job descriptions, and documented employee training records (40 CFR 265.16 (d) (e) and 3745-65-16).

5. The Contingency Plan must describe arrangements agreed to by local police departments, fire departments, hospitals, and emergency response teams to coordinate emergency services (40 CFR 265.52 and 3745-65-52 (c) and 40 CFR 265.37 and 3745-65-37).

6. A copy of the Contingency Plan and any plan revisions is to be submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan (40 CFR 265.53 and 3745-65-53).

7. At all times there must be at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures (40 CFR 265.55 and 3745-65-55).

8. The Contingency Plan must include an evacuation plan for facility personnel as there is a possibility that evacuation could be necessary, if, reactive wastes are stored on-site, (40 CFR 265.51 (f) and 3745-65-52 (F)).

9. The Closure Plan should include a description of how and when the facility will be partially closed, if applicable, and finally closed and a description of the steps needed to decontaminate facility equipment during closure(40 CFR 265.112 (a) and 3745-66-12 (A)).

10. The Closure Plan should include an estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility (40 CFR 265.112 (a) (4) and 3745-66-12 (C)).

11. Documentation of financial assurance for closure should be provided (40 CFR 265.143).

12. The owner or operator must develop and follow a written schedule for inspecting safety and emergency equipment and security devices. This schedule should include types of problems and frequency of inspections. Areas subject to spills, such as loading and unloading areas should be inspected daily when in use (40 CFR 265.15 (b) and 3745-65-15 (B)).

13. Inspections must be regularly documented in inspection logs which include date and time of inspecting name of inspector, notification of observations made and date and nature of remedial actions (40 CFR 265.15 (d) and 3745-65-15 (D)).

14. The area where containers are stored is to be inspected for evidence of leaks or corrosion at least weekly and such inspections regularly documented (40 CFR 265.174 and 3745-66-74).

15. The location and quantity of each type of hazardous waste within the storage facility must be documented (40 CFR 265.73 and 3745-65-73 (B)).

16. Aisle space must be maintained between drums in storage to allow the inobstructed movement of personnel and emergency equipment (40 CFR 265.35 and 3745-65-35).

17. Containers holding reactive wastes are to be located at least 50 feet (15 meters) from the facility's property line (40 CFR 265.176 and 3745-66-76).

18. Physical separation of incompatible reactive wastes is required (40 CFR 265.17 (A) and 3745-65-17 (A) and 40 CFR 265.177 (c) and 3745-66-77 (c)) unless operator can provide detailed analytical data which demonstrates that accidental comingling will not cause a reaction.

Re: Metals Applied, Incorporated
02-18-0498
Cuyahoga County

Drew Koler
Metals Applied, Incorporated
2800 East 33rd Street
Cleveland, Ohio 44115

July 28, 1982

Dear Mr. Koler:

On July 7, 1982, I inspected the Metals Applied, Incorporated facility located at 2800 East 33rd Street, Cleveland, Ohio. You represented Metals Applied, Inc. during this inspection. A copy of the report is enclosed.

Your facility was found to be in non-compliance with parts of the Ohio Hazardous Waste Regulations 3745-50 thru 3745-58 and the Federal Regulations 40 CFR 260 thru 265. The following deficiencies were noted:

Deficiency	Regulation
1. 24 hour surveillance	40 CFR 265.14 & OAC 3745-55-14
2. Controlled Entry	40 CFR 265.14 (b)(2) & OAC 3745-55-14 -B-2-b

This facility will be reinspected within 60 days to determine compliance with the above violations.

A copy of the inspection report will be forwarded to the U.S. EPA - Region V. Please feel free to contact me or Kathy Homer of the U.S. EPA at (312) 866-7435.

Yours truly,

Robert E. Buda

Robert E. Buda
Environmental Scientist
Division of Hazardous Materials Management

REB:km

Enclosure

cc: Paula Cotter, DHMM, C.O.
Bob Fragale, HWFAB, C.O.
Kathy Homer, SIP, U.S. EPA - Region V

RCRA Inspection Report

EPA Identification Number OH D004173621

HWFAB Permit Number (if appropriate) 02-18-0498

Facility Name METAL APPLIED, INCORPORATED

Location 2800 EAST 33rd STREET

CLEVELAND, Ohio 44115

Person(s) Interviewed	Title	Telephone
DREW KOLER	QUALITY ASSURANCE LAB SUPERVISOR	(216) 241-5913

Inspector(s)	Agency/Title	Telephone
ROBERT E. BUDA	Ohio EPA ENV. SCIENTIST	(216) 425-9171
	Ohio EPA	
	Ohio EPA	

Installation Activity

Mark One

- ☑ Generator only (G)
- ☐ Transporter only (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which forms were used -

- ☑ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- ☐ Groundwater Monitoring
- ☑ Closure and Post-Closure
- ☑ Financial Requirements
- ☑ Containers S01
- ☐ Tanks S02/T01
- ☑ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment T03
- ☑ Chemical/Physical/Biological T04
- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD004173621

Facility: METAL APPLIED, INCORPORATED Address: 2800 EAST 33rd STREET City: CLEVELAND

State: OHIO Zip Code: 44115 County: CUYAHOGA Telephone: (216) 241-5913

Facility Operator: DREW KOLER Title: QA LAB SUPERVISOR Telephone: (216) 241-5913

Facility Owner: CLEVELAND PNEUMATIC COMPANY Address: 3781 E. 77th STREET

City: CLEVELAND State: OHIO Zip Code: 44105 Telephone: (216) 341-1760

Type of Ownership: ✓ Private ____ Government State HWFAB No. 02-18-0498

Date of Inspection: 7-7-82 Time of Inspection: (Start) 9AM (Finish) 11AM

Advance Notification? ___ No ✓ Yes: ____

Weather Conditions: SUNNY WARM

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	DREW KOLER	QUALITY ASSURANCE LAB SUPERVISOR	(216) 241-5913
2.			
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	ROBERT E. BUDA	ENVIRONMENTAL SUPERVISOR	(216) 425-9171
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ✓ Generation B. ✓ Storage C. ____ Treatment
D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001, F006, F008, F009, P029, P106, U226, U228, P030, F002, D007, D008, D006, F007

b) Non-Listed Wastes: ____ (D001) I ✓ (D002) C ____ (D003) R ✓ (D000) T

3. Has this facility submitted a Part A Permit Application? ✓ Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

____ Yes, See Remark # ____ ✓ No

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ✓ No

a) Applicable U.S. EPA I.D. Number OHD 004173621

b) Ohio P.U.C.O. GR TRSF Number —

7. A brief description of site activity:

METAL FINISHING - ELECTROPLATING

REMARKS, PART 1. (GENERAL INFORMATION)

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	✓			
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	✓			
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.			✓	
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.			✓	
8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:			✓	
a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.			✓	

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	✓			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?		✓		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.		✓		
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	✓			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.			✓	NO EXCEPTIONS HAVE OCCURED
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	✓			

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.			✓	
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).			✓	
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.			✓	
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.			✓	
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).			✓	
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).			✓	
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).			✓	
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).			✓	
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).			✓	

	Yes	No	N/A	Remark #
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.			✓	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	✓			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	✓			
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	✓			
a) 24-hour surveillance system.		✓		A GUARD IS ON DUTY DURING the 3RD SHIFT WHEN the facility IS NOT IN PRODUCTION.
b) Artificial or natural barrier completely surrounding the active portion of the facility.		✓		
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	✓			TO ENTER the plant AN INDIVIDUAL HAS TO BE BUZZED IN by the receptionist
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	✓			THE HAZARDOUS WASTE STORAGE FACILITY CAN BE ENTERED by INDIVIDUALS BECAUSE IT IS OUTSIDE the building AND NOT FENCED IN

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15 and 3745-55-15)	✓			
a) Inspect emergency equipment.	✓			
b) Inspect monitoring equipment.	✓			
c) Inspect security, alarm and communication devices.	✓			
d) Inspect process equipment (pipes, pumps, etc.).	✓			
e) Inspect containment structures (dikes, curbs, etc.).			✓	
f) Inspect facility for structural malfunctions (roof, floor, etc.).			✓	
g) Inspect hazardous waste handling/loading areas each day used.	✓			
h) Record of any malfunctions due to equipment or operator errors.			✓	none have occurred
i) Record of any hazardous waste discharges.			✓	none have occurred
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	✓			
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓			
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	✓			

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.				
b) Physical separation of incompatible waste materials.				
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.			✓	no comingling of waste materials

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	✓			
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	✓			

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	✓			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).			✓	

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	✓			
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	✓			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	✓			

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	✓			AS NEEDED
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.			✓	

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	✓			
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b) (1) and 3745-55-73-B-1).	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓			

	Yes	No	N/A	Remark#
e) The present physical location of each hazardous waste within the facility.	✓			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b) (2) and 3745-55-73-B-2).			✓	
g) Records of any waste analyses and trial tests required to be performed.	✓			
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	✓			
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	✓			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	✓			
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	✓			

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).			✓	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).			✓	

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	___	___	✓	___
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	___	___	✓	none have occured
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	___	___	✓	none have occured
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/ Director within 15 days.	___	___	✓	___

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	___	___	___	___

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.				
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.				

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	✓			
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	✓			
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.			✓	
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	✓			
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	✓			w/ PIs as needed

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	___	___	✓	___
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	___	___	✓	___
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	___	___	✓	___
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	___	___	✓	___
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	___	___	✓	___

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	___	___	✓	___
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	___	___	✓	___
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	___	___	✓	___
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	___	___	✓	___

	Yes	No	N/A	Remark #
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.			✓	

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	✓			

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	✓			
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	✓			

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).			✓	
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).			✓	

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	✓			

Subpart Q: Chemical, Physical and Biological Treatment

	Yes	No	N/A	Remark #
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	✓			CONTROLLED FROM CONTROL BOARD
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	✓			
4. Are inspection precedures followed according to 265.403?	✓			
5. Are the special requirements fulfilled for ignitable or reactive waste?	✓			CYANIDE IS NEUTRALIZED PRIOR TO BEING
6. Are incompatible waste treated? (If yes, 265.17(b) applies.)		✓		TREATED. DISPOSAL IS INTO THE SANITARY SEWER

NOTE: EPA HAS TEMPORARILY SUSPENDED THE APPLICABILITY OF THE REQUIREMENTS OF THE HAZARDOUS WASTE REGULATIONS IN 40 CFR PARTS 122, 264 AND 265 TO OWNERS AND OPERATORS OF (1) WASTEWATER TREATMENT TANKS THAT RECEIVE, STORE, AND TREAT WASTEWATERS THAT ARE HAZARDOUS WASTE OR THAT GENERATE, STORE OR TREAT A WASTEWATER TREATMENT SLUDGE WHICH IS A HAZARDOUS WASTE WHERE SUCH WASTEWATERS ARE SUBJECT TO REGULATION UNDER SECTIONS 402 OR 307(b) OF THE CLEAN WATER ACT (33 U.S.C. 1251 ET SEQ.) AND (2) NEUTRALIZATION TANKS, TRANSPORT VEHICLES, VESSELS, OR CONTAINERS WHICH NEUTRALIZE WASTES WHICH ARE HAZARDOUS ONLY BECAUSE THEY EXHIBIT THE CORROSIVITY CHARACTERISTIC UNDER 40 CFR 261.22 OR ARE LISTED AS HAZARDOUS WASTES IN SUBPART D OF 40 CFR PART 261 ONLY FOR THIS REASON.

Re: Application Number 81-HW-0498
Cuyahoga County

August 24, 1981

Timothy Aish, Manager
Quality Assurance
Metals Applied
2800 East 33rd Street
Cleveland, Ohio 44115

Dear Mr. Aish:

On July 21, 1981, Richard Shandross of the U.S. EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Timothy Aish.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Richard Shandross, U.S. EPA, Region V

CERTIFIED MAIL

RCRA INSPECTION REPORT

INTERIM STATUS STAN RDS, TREATMENT, STORAGE AND D OSAL FACILITIES

DEFICIENCY NOTIFICATION TABLE

ISS INSPECTION

FACILITY NO. - 81 - HW - 0498
OWNER - Cleveland Pneumatic Co.
FACILITY NAME - Metals Applied
FACILITY LOCATION - 2800 East 33rd Street, Cleveland, Ohio
FACILITY CONTACT - Timothy Aish, QA. Manager PHONE NO. - (216) 241-5913
ISS INSPECTION DATE - 7/21/81

Page	COLUMN I Item No.			COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III	A	1	3745-55-12(A)	265.12 (A)			
			2					
		B	1	3745-55-13	265.13			
			2	3745-55-13	265.13	B		
			3	"	"			
		C	1	3745-55-14	265.14		✓	
			2	"	"			
			3	"	"			
			4	"	"	B	✓	
		D	1	3745-55-15	265.15			
			2	"	"			
			3	"	"			
4			4	"	"	B		
			5	"	"	B		
			6	"	"	B		
			7	"	"	B		
			8	"	"	B	✓	
		E	1	3745-55-16	265.16	B		
			2	"	"	B		
			3	"	"	B		
			4	"	"	B		
			5	"	"	B		
			6	"	"	B	✓	
		F	1	3745-55-17	265.17			
			2	"	"			
			3	"	"			
5	IV	A		3745-55-31	265.31			
		B	1	3745-55-32	265.32			
			2	"	"		✓	
			3	"	"			
		C	1	3745-55-33	265.33			
			2	"	"			
		D		3745-55-34	265.34			
		E		3745-55-35	265.35		✓	
6	V	A	1	3745-55-52	265.52		✓	

Page	COLUMN I Item No.			COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
6 (Con't.)	V	A	2	3745-55-52	265.52	E	✓	
			3	"	"			
			4	"	"	~~E~~	✓	
			5	"	"	B		
7		B		3745-55-53	265.53	B		
		C	1	3745-55-55	265.55			
			2	"	"			
			3	"	"			
		D		3745-55-56	"			
	VI	A	1	3745-55-71	265.71	B		
			2	"	"	B		
		B		3745-55-72	265.72			
8		C	1	3745-55-73	265.73			
			2b	"	"			
			c	"	"		✓	
			d	"	"			
			e	"	"			
			f	"	"			
			g	"	"			
9	VII	A	1	3745-56-03	265.112	B		
			2	"	"			
			3	"	"			
			4	3745-56-32	265.142			
		B	1	3745-56-09	265.118			
			2	"	"			
			3	"	"			
			4	3745-56-34	265.143			
	VIII	I	1	3745-56-51	265.171			
			2	3745-56-52	265.172			
			3	3745-56-53	265.173			
			4	"	"	~~B~~		
10			5	3745-56-54	265.174	B	✓	
			6	3745-56-56	265.176			
			7	3745-56-57	265.177			
		J	1	3745-56-72	265.192			
			2	"	"			
			3	"	"			
			4	3745-56-73	265.193			
			5	3745-56-74	265.194			
			6	3745-56-78	265.198			
11			7	3745-56-79	265.199			
			8	3745-56-78	265.198			
		K	1	3745-57-03	265.222			
			2	3745-57-04	265.223			
			3	3745-57-06	265.225			
			4	3745-57-07	265.226			
			5	"	"			
			6	3745-57-10	265.229			
12			7	3745-57-11	265.230			

Page	COLUMN I Item No.			COLUMN II OEPA Reference	COLUMN III USEPA Reference	COLUMN IV Use Code Following	COLUMN V Refer to ISS Remark	COLUMN VI OEPA USE
12		L	1	3745-57-31	265.251			
			2	3745-57-32	265.252			
			3	3745-57-33	265.258			
			4	3745-57-36	265.256			
			5	"	"			
			6	3745-57-37	265.257			
			7	3745-57-37	265.257			
13		M	1	3745-57-52	265.272			
			2	"	"			
			3	3745-57-53	265.273			
			4	3745-57-56	265.276			
			5	3745-57-58	265.278			
			6	3745-57-58	265.278			
			7	3745-57-59	265.279			
			8	3745-57-61	265.281			
			9	3745-57-62	265.282			
14	N	A	1	3745-57-72	265.302			
			2	"	"			
			3	"	"			
			4	"	"			
		B	1	3745-57-79	265.309			
			2	"	"			
		C	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.192			
		D		3745-57-82	265.312			
				3745-55-17	265.17(b)			
15		E		3745-57-83	265.313			
				3745-55-17	265.17(b)			
		F	1	3745-57-84	265.314			
			2	"	"			
			3	"	"			
			4	"	"			
		G		3745-57-85	265.315			
16		O&P						
	I	B	1	3745-58-33	265.373			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
	II	A	1a	3745-58-35	265.375			
			b	"	"			
			c	"	"			
17			2a	3745-58-35	265.375			
			b	"	"			
		B	1	"	"			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			

Page	COLUMN I Item No.			COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer to ISS Remark	COLUMN VI OEPA USE
17 (Con't)	III	A		3745-58-37	265.377			
		B		"	"			
		C		"	"			
		D		"	"			
		E		"	"			
		F		"	"			
		G		"	"			
	IV	A	1	3745-58-42	265.382			
			2	"	"			
19		Q	1	3745-58-51	265.401			
			2	"	"			
			3	3745-58-52	265.402			
			4	3745-58-53	265.403			
			5	3745-58-55	265.405			
			6	3745-58-56	265.406			
20	IX	I	(A)	3745-52-40	262.40			
			(B) 1	3745-52-21	262.21			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
			6	"	"			
			7	"	"			
			8	3745-50-42	122.6			
			(C)	3745-52-42	262.42			
21			1	3745-52-42	"			
			2	"	"			
			(D) 1	3745-52-42	262.42			
			2	"	"			
		2	(A)	3745-52-30	262.30			
			(B)	3745-52-31	262.31			
			(C)	3745-52-33	262.33			
22		3	1	3745-52-34	262.34			
			2	"	"			
			3	3745-56-54	265.174			
			4a	3745-56-72	265.192			
			b	"	"			
			c	"	"			
			d	3745-56-74	265.184			
			e	3745-56-78	265.198			
			f	3745-56-79	265.199			
23	VI		A	3745-52-40	262.40			
			B	3745-52-41	262.41			
	VII		1a	3745-52-50	262.50			
			b	"	"			
			c	"	"			
			2	"	"			
24	X	I		3745-53-22	263.22			
	II		A	3745-53-20	263.20			
			B	"	"			
	V		A	3745-53-10	263.10			
			B	3745-53-10	"			

KEY TO CODED ITEMS (COLU. IV)

A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.

B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.

D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.

E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.

F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.

G. NFPA's code requires that the tanks be located 50 feet from the property line.

81-HW-0498
STATE IDENTIFICATION NUMBER
(If Applicable)

OHD004173621
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Metals Applied

(B) Street: 2800 E.33rd St.

(C) City: Cleveland (D) State: OH (E) Zip Code: 44115

(F) Phone: (216) 241 5913 (G) County: Cuyahoga

(H) Operator: ~~Same~~ RS Timothy Aish

(I) Street: (Same as above)

(J) City: (K) State: (L) Zip Code

(M) Phone: (N) County:

(O) Owner: Cleveland Pneumatic Co.

(P) Street: 3781 E.77th St.

(Q) City: Cleveland (R) State: OH (S) Zip Code: 44105

(T) Phone: (216) 341-1700 (U) County: Cuyahoga

(V) Date of Inspection: 7-21-81 (W) Time of Inspection (From) 1:15pm (To) 4:30pm

(X) Weather Conditions: About 75°F. Intermittent rain.

7-1-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Timothy Aish	Manager Qual. Assurance	(216) 241-5913
Drew Koler	?	

(Z) Inspection Participants	Agency/Title	Telephone
Richard Shandross	USEPA / Env. Engr.	(312) 886-6148

(AA) Preparer Information

Name	Agency/Title	Telephone
Richard Shandross	USEPA / Env. Engr	(312) 886-6148

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

(A.) Storage and/or Treatment
   (1.) Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)

B. Land Treatment (M)

C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

✓ E. Chemical, Physical, and Biological Treatment (Q)

NOTE: If facility is also a generator or transportor of hazardous waste complete sections IX and X of this form as appropriate.

II. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		✓		N/A no reciept = off-site only
2. Facility expansion?		✓		N/A no expansion
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			EP toxic & CN plus total metals.
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?		✓		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?			NA /	No plan
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓			24 hour company guard, but not continuously monitor - hourly rounds.
2.a Artificial or natural barrier around facility? (or)		✓		
2.b Controlled entry? (and)	✓	✓		to plant only, not to storage.
4. Danger sign(s) at entrance?		✓		Nothing at treatment area. Stencil "Hazardous waste area" behind drums (on wall) for storage
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?		✓		
2. Records of operator error?		✓		
3. Records of discharges?		✓		

*Not Inspected

	Yes	No	NI	Remarks
4. Inspection schedule?	___	✓	___	
5. Safety, emergency equipment?	___	✓	___	
6. Security devices?	___	✓	___	
7. Operating and structural devices?	___	✓	___	*
8. Inspection log?	___	✓	___	Company says it inspects barrels weekly for leaks, and centrifuge daily for operation, maintenance and leaks.
(E) Do personnel training records include:				
1. Job titles?	___	✓	___	
2. Job descriptions?	___	✓	___	
3. Description of training?	___	✓	___	
4. Records of training?	___	✓	___	
5. Have facility personnel received required training by 5-19-81?	___	✓	___	RS ~~[illegible]~~ - no records. since [illegible] plans, etc, there is nothing to train the employees to follow.
6. Do new personnel receive required training within six months?	___	___	✓	unknown
(F) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	___	___	✓	was
2. No smoking signs?	✓	___	___	
3. Separation and protection from ignition sources?	___	___	✓	

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

		Yes	No	NI	Remarks
.)	Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	—	✓	—	
(B)	If required, does the facility have the following equipment:				
	1. Internal communications or alarm systems?	✓	—	—	For treatment only via intercomputer. Phone for storage area in about 50 feet away. (I didn't actually see this phone) None in the immediate area.
	2. Telephone or 2-way radios at the scene of operations?	✓	—	—	
	3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓	—	—	Fire extinguishers, Hi Dri absorbant material. Decon is done by washing or discarding (in HW barrels)
	Indicate the volume of water and/or foam available for fire control:				
(C)	Testing and Maintenance of Emergency Equipment:				
	1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓	—	—	
	2. Is emergency equipment maintained in operable condition?	✓	—	—	
(D)	Has owner or operator provided immediate access to internal alarms? (if needed)	—	—	—	N/A - always more than one person
(E)	Is there adequate aisle space for unobstructed movement?	✓	~~—~~ RS	—	Although there is little aisle space (in fact none), the waste is a sludge or ignitable material which would not leak just. Other waste is non ignitable liquid (111 trichlor) which is not reactive either.

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(a) Does the Contingency Plan contain the following information:	Yes	No	NI	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			However doesn't address: 265.56 (a) (c) (d) (e)–(i)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		✓		Local clinic familiar w/material handled. No fire/police due to nature of waste material.
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			list, but no description
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)		✓		

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?		✓		
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				N/A no emergency

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI	Remarks
(A) Use of Manifest System				On-site RS ~~Off-site~~ only.
1. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)				
2. Are records of past shipments retained for 3 years?				
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				

(C) Operating Record

	Yes	No	NI	Remarks
1. Does the owner or operator maintain an operating record as required in 265.73?	✓			
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	✓			
c. The location and quantity of each hazardous waste within the facility?	✓			location by having a # on each drum and a log of all drum numbers. There is a problem here because they use the drum number to tell how many drums are on site - yet when a drum gets taken offsite it is not noted. Even if it were, the system is very cumbersome and confusing.
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	not RS		NA	storage/treatment.
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓			yes
f. Reports detailing all incidents that required implementation of the Contingency Plan?				N/A
g. All closure and post closure costs as applicable?	RS ~~✓~~		~~NA~~	~~No closures~~
	✓			

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI	Remarks
(A) Closure				
1. Is the facility closure plan available for inspection?		✓		
2. Has this plan been submitted to the Regional Administrator		N/A		no plan
3. Has closure begun?		✓		
4. Is the written closure cost estimate available?	✓			
(B) Post closure care and use of property	N/A			not disposal
1. Is the facility post-closure plan available for inspection?				
2. Has this plan been submitted to the Regional Administrator?				
3. Has the post-closure period begun?				
4. Is the written post-closure cost estimate available?				

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI	Remarks
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers managed to prevent leaks?	✓			
4. Are containers inspected weekly for leaks and defects?				

	Yes	No	NI	Remarks
5. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).		✓		(Reactive)
6. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A no incompatibles
7. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				N/A no incompatibles

J
TANKS N/A

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) ___ ___ ___ _____

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____gallons

Tank diameter: _____feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS N/A

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	___	___	___	_____
2. Do earthen dikes have protective covers?	___	___	___	_____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	___	___	___	_____
4. Is the freeboard level inspected at least daily?	___	___	___	_____
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	___	___	___	_____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	_____

	Yes	No	NI	Remarks
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____

L

WASTE PILES N/A

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind?	___	___	___	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	___	___	___	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? (The effective date of this provision is Nov. 19, 1981.)	___	___	___	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	___	___	___	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	___	___	___	_____

*Not Inspected

M

LAND TREATMENT

Facility Name: _____ Date of Inspection: _____

		Yes	No	NI	Remarks
1.	Is treated hazardous waste capable of biological or chemical degradation?	___	___	___	_____
2.	Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?	___	___	___	_____
3.	Is waste analyzed according to 265.273?	___	___	___	_____
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	___	___	___	_____
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	___	___	___	_____
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	___	___	___	_____
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	___	___	___	_____
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	___	___	___	_____
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies)	___	___	___	_____

N

LANDFILLS N/A

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	___	___	___	_____
**2. Collection of run-off from active portions of the fill?	___	___	___	_____
**3. Is collected run off treated?	___	___	___	_____
4. Control of wind dispersal of hazardous waste?	___	___	___	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	___	___	___	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available?	___	___	___	_____
2. Has this plan been submitted to the Regional Administrator?	___	___	___	_____
3. Has closure begun?	___	___	___	_____
4. Is the closure cost estimate available?	___	___	___	_____
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.)	___	___	___	_____

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

	Yes	No	NI	Remarks
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
2. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
3. Does the landfill have a functional leachate collection system?	___	___	___	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

O and P
INCINERATION and THERMAL TREATMENT

N/A

(. Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

(A) Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

(B) Components and steady state condition:

Was each component at steady state prior to adding waste?

	Component	Yes	No	NI	Remarks
1.	_____	___	___	___	_____
2.	_____	___	___	___	_____
3.	_____	___	___	___	_____
4.	_____	___	___	___	_____
5.	_____	___	___	___	_____

II. Waste Analysis

(A) Minimuim requirements, for wastes not prviously burned/treated.

	Yes	No	NI	Remarks
1. Required analyses; has an analysis been performed for the following?				
a. Heating value	___	___	___	_____
b. Halogen content	___	___	___	_____
c. Sulfur content	___	___	___	_____

	Yes	No	NI	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury:	___	___	___	_____

(B) List other paramters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI	Remarks
(A) Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
(B) Is steady stte maintained or corrections attempted?	___	___	___	_____
(C) Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
(D) Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
(E) If yes to D above, were corrections made to return emissions to normal apperance?**	___	___	___	_____
(F) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____

* Specify in Remarks for what period of time this was checked.

	Yes	No	NI	Remarks
(G) Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

IV. Open Burning

(A) Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
2. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: Metals Applied

Date of Inspection: 7-21-81

	Yes	No	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	✓			operated from control board
3. Has the owner or operator addressed the waste analysis requirements of 265.402?				Do not change waste or process; will be (possibly) changing process (but not treatment code) in future.
4. Are inspection procedures followed according to 265.403?	✓			
5. Are the special requirements fulfilled for ignitable or reactive wastes?	✓			cyanide is 'neutralized' prior to being treated.
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)		✓		(waste treated is a sludge*. process is dewatering)

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

*as defined by 260.10.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI	Remarks
(A) Does the operator have copies of the manifest available for review?	___	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	___	___	___	_____
2. Name, mailing address, telephone number, and EPA ID number of Generator				
3. Name and EPA ID Number of Transporter(s)?	___	___	___	_____
4. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	___	___	___	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	___	___	___	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	___	___	___	_____
7. Required certification?	___	___	___	_____
8. Required signatures?	___	___	___	_____
(C) Did the generator receive a signed copy of each manifest from the designated facility within 35 days?	___	___	___	_____

	Yes	No	NI	Remarks
1. If not, was an Exception Report submitted to the Regional Administrator?	___	___	___	_____
2. Was the Exception Report submitted within 45 days of the date of the waste was accepted by the initial transporter?	___	___	___	_____
(D) If an Exception Report was submitted, did it contain the following information:				
1. A legible copy of the manifest for which the generator does not have confirmation of delivery?	___	___	___	_____
2. A cover letter is signed by the generator or his representative explaining the efforts taken to locate the hazardous waste and the results of those efforts?	___	___	___	_____
(E) How many manifests were checked during the inspection?				_____
(F) Describe the generators system for tracking manifests:				_____

_____

_____

_____

_____

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	___	___	___	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	___	___	___	_____
(C) If required, are placards available to transporters of hazardous waste?	___	___	___	_____

Omit Section 3 if the fac.ity has interim status and its art A permit application describes storage

3. On Site Accumulation

		Yes	No	NI	Remarks
1.	Are containers marked with start of accumulation date?	___	___	___	_____
2.	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____
3.	Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections ignitable or reactive waste located at least 15 meters (50 feet) from facility's property line?	___	___	___	_____
4.	If waste are stored in tanks, are the tanks managed according to the following requirements?				
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	_____
	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	_____
	c. Do continous feed systems have a waste-feed cutoff?	___	___	___	_____
	d. Are required daily and weekly inspections done?	___	___	___	_____
	e. Are reactive & ignitable wastes in tankks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	_____
	f. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.)	___	___	___	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	___	___	___	_____
(B) Has the generator submitted Annual Reports and Exception Reports as required?	___	___	___	_____

VIII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI	Remarks
Has the installation imported or exported Hazardous Waste?	___	___	___	_____

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste; has a generator:				
a. Notified the Administrator in writing?	___	___	___	_____
b. Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?	___	___	___	_____
c. Met the Manifest requirements?	___	___	___	_____
2. Importing Hazardous Waste; has the generator met the manifest requirements?	___	___	___	_____

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM and RECORDKEEPING
(Subpart B)

	Yes	No	NI	Remarks
Are copies of the completed manifests of shipping paper(s) available for review and retained for three years?	___	___	___	_____

II. INTERNATIONAL SHIPMENTS

	Yes	No	NI	Remarks
(A) Does the tranporter record on the manifest the date the waste left the U.S.?	___	___	___	_____
(B) Are signed completed manifest(s) on file?	___	___	___	_____

V. MISCELLANEOUS

	Yes	No	NI	Remarks
(A) Does transporter trnsport hazardous waste into the U.S. from abroad?	___	___	___	_____
(B) Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____

NOTE: If (A) or (B) were answered "Yes" then the transporter is also a Generator and must comply with the Generator regulations.

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Although the company claims to inspect the barrels with the proper frequency, configuration of storage (see below) makes that unachievable without moving drums. *

Electroplating shop - Captive, I believe. Plates airplane parts.

* After the inspection, I called back the operator. He stated that the drum inspector can see any leaks due to spaces between drums. He said that the inspector climbs up on a few and looks in, and looks in the sides as well. My memory fails to serve me as to whether this is indeed possible.

approx. configuration: Wall

RS 7/29/81

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards	D: Contingency and Emergency	G: Closure
C: Preparedness and Prevention	E: Manifest/Records/Reporting	H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).		✓		
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).		✓		
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).		✓		
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).		✓		
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or		✓		
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2).	✓			6' fence with locked gate

	Yes	No	N/A	Remark #
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	✓			
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)		✓		
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)		✓		not documentable
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.		✓		not documentable
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.		✓		
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	✓			
b) Physical separation of incompatible waste materials.		✓		Documentation needed to confirm that 20 drums of unknown material are not incompatable
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).			✓	

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	✓			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?		✓		
Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	✓			neutralization extend granule. Disposal into sanitary sewer.
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	✓			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)			✓	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	✓			

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.			✓	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".			✓	
b) The date that accumulation began is clearly marked on each container.			✓	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).		✓		no documentation of records of program
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).		✓		

1/12/3 9:30 - 1:30
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-18-0498

PART 1., GENERAL INFORMATION

U.S. EPA I.D. # OHD 004173621

Facility: Metals Applied Inc. Address: 2800 East 33rd Street City: Cleveland

State: Ohio Zip Code: 44115 County: Cuyahoga Telephone: (216) 241-5913

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	Drew Koler	Quality Assurance Lab Supervisor	(216) 241-5913
2.	Tom Quatrini	Personnel Director	(216) 241-5913
3.			

INSPECTOR(S)

1.	Paul Beals	Environmental Scientist	(216) 425-9171
2.	Deborah Berg	Environmental Scientist	(216) 425-9171
3.			

INSTALLATION ACTIVITY

Mark One

- [x] Generator only (G)
- [ ] Transporter (T)
- [x] TSDF only
- [ ] G-T
- [x] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- [x] General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure
- [x] Containers S01
- [ ] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/ Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

Revised 9/15/82

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	✓			
2. If "yes", is it complete and accurate?	✓			
3. Has the facility submitted a Part B?		✓		

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Metal finishing - electroplating

Listed wastes - F001, F002, F006, F007, F008, F009

P029, P030, P106

U226, U228

D006, D007, D008

Non listed wastes - D002(c), D000(EPT.),

- cyanide neutralization from electroplating sludge - discharge disposed into sanitary sewer

January 24, 1983

This facility will be reinspected within 60 days to determine compliance with the above violations.

Please feel free to contact me or Kathy Homer of the U.S. EPA at (312) 866-7435.

Yours truly,

Rodney Beals

Rodney Beals
Environmental Scientist
Division of Hazardous Materials Management
Northeast District Office

RB:km

Enclosure

cc: Paula Cotter, Division of Hazardous Materials Management, Central Office
Kathy Homer, U.S. EPA - Region V

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	✓			punctured 55 gallon drums
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			nearest ~75 ft. from storage area
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)		✓		no documentation
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	✓			nearest phone 75' from storage area
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)		✓		
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)		✓		
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)			✓	

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.		✓		no documentation
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))		✓		deemed not necessary by facility
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)		✓		not submitted to local authorities
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)	✓			in process
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)		✓		
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.			✓	

RCRA INTERIM STATUS INSPECTION FORM

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

		Yes	No	N/A	Remark #
1.	The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:				
	a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1)	—	✓	—	~20 drums of waste in storage at facility prior to knowledge of personnel. No waste analysis.
	b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓	—	—	—
	c) The estimated (or actual) weight, volume or density of the waste material(s).	—	✓	—	available but not documented
	d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓	—	—	—
	e) The present physical location of each hazardous waste within the facility.	—	✓	—	—
	f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)	—	—	✓	—
	g) Records of any waste analyses and trial tests required to be performed.	✓	—	—	—
	h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).	—	✓	—	—
	i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).	—	✓	—	—
	j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	✓	—	—	—

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.	✓			

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)			✓	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)			✓	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))			✓	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.			✓	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.			✓	

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)	✓			
a) A description of how and when the facility will be closed. (265.112(a)(1).		✓		

	Yes	No	N/A	Remark #
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.			✓	
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.(NOTE: Maximum inventory should agree with the permit.)	✓			
d) A description of steps taken to decontaminate facility equipment.		✓		
e) The year closure is expected to begin and a schedule for the various phases of closure.		✓		
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.			✓	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.			✓	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or		✓		
b) A surety bond, or		✓		
c) A closure letter of credit, or		✓		
d) A combination of financial mechanisms.		✓		

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

no documentation of financial assurance

	Yes	No	N/A	Remark #
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.	✓			

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓			
b) In good physical condition (265.171)	✓			
c) Compatible with the wastes stored in them (265.172)		✓		Questionable for 20 drums of unknown wastes
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓			Documentation need to confirm compatability
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)		✓		no documentation
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).		✓		storage area abuts public road
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c)		✓		

Metals Applied
Incorporated
Subsidiary of Cleveland Pneumatic Co.
2800 East 33rd Street
Cleveland, Ohio 44115
216 241-5913

METALS APPLIED, INC.
HAZARDOUS WASTE
FACILITY EQUIPMENT

DECONTAMINATION PROCEDURES

I. Decontamination procedures for equipment contaminated with cyanide bearing wastes:

A. Spill clean up equipment - shovels, brooms, drums, drum pumps, etc.

1. Remove any Hazardous Waste Residue material and place in the approved hazardous waste DOT container.

2. Rinse the equipment with the 15% sodium hypochlorite (bleach) solution stored next to the wastewater treatment area. Make sure that the rinsing is done in a well ventilated area as toxic cyanogen chloride gas may be released and/or (See 3).

3. Triple rinse with cold tap water, air dry.

4. Containerize all clean up solutions/residue and used equipment in DOT approved containers for storage and offsite disposal.

B. Personnel protective/safety equipment - rubber/neoprene coveralls, aprons, suits, boots, gloves, face shields, respirators, etc.

1. Follow the same steps as outlined above. A cloth soaked with the hypochlorite solution may be used to wipe down the equipment where rinsing would be impractical.

II. Decontamination procedures for equipment contaminated with chromium bearing wastes:

A. Spill clean up equipment - shovels, brooms, drums, drum pumps, etc.

1. Remove any hazardous waste residue material and place in the approved hazardous waste DOT container.

2. Rinse the equipment with a solution of sodium hydrosulfite prepared by the lab. Make sure that the rinsing is done in a well ventilated area and/or (See 3).

3. Triple rinse with cold tap water, air dry.

4. Containerize all clean up solutions/residue and used equipment in DOT approved containers for storage and offsite disposal.

B. Personnel protective/safety equipment - rubber/neoprene coveralls, aprons, suits, boots, gloves, face shields, respirators, etc.

1. Follow the same steps as outlined above. A cloth soaked with the hydrosulfite solution may be used to wipe down the equipment where rinsing would be impractical.

III. Decontamination prcedures for equipment contaminated with solvent/paint bearing wastes (Acetone, Xylene, Trichloroethylene, etc.):

A. Spill clean up equipment - shovels, brooms, drums, drum pumps, etc.

1. Remove as much of the hazardous waste residue as possible by draining and/or wiping with an absorbent cloth, air dry.

2. Containerize all clean up residues and used equipment in DOT approved containers for storage and offsite disposal.

B. Personnel protective/safety equipment - rubber/neoprene coveralls, aprons, suits, boots, gloves, face shields, respirators, etc.

1. Follow the same steps as outlined above.

IV. Decontamination procedures for miscellaneous wastes - acids (sulfuric, hydrochloric, nitric, hydroflouric); caustics (liquid/dry sodium hyroxide); nickel wastes (metals hydroxide sludges):

A. Spill clean up equipment - shovels, brooms, drums, drum pumps, etc.

1. Remove any hazardous waste residue material and place in the approved hazardous waste DOT container.

2. Triple rinse the equipment with a copius amount of cold tap water, air dry.

*ALWAYS ADD CONCENTRATED ACIDS/CAUSTICS TO WATER FIRST. DO NOT ADD WATER TO A CONTAINER HOLDING AN ACID OR CAUSTIC WASTE, AS A LARGE AMOUNT OF HEAT AND FUMES MAY BE GENERATED.

3. Containerize all clean up solutions/residue and used equipment in DOT approved containers for storage and offsite disposal.

B. Personnel protective/safety equipment - rubber/neoprene coveralls, aprons, suits, boots, gloves, face shield, etc.

1. Follow the same steps as outlined above. A cloth soaked with water may be used to wipe down the equipment where rinsing would be impractical.

If there are any questions regarding these procedures, (i.e. waste identification, container specifications, etc.) the Quality Assurance Lab should be contacted immediately.

METALS Applied INC.
(Subsidiary of)
The Cleveland Pneumatic Co.

2800 EAST 33rd STREET
CLEVELAND, OHIO 44115
Phone: (216) 241-5913

August 18, 1980

Environmental Protection Agency, Region V
RCRA Activities
P. O. Box 7861
Chicago, Illinois 60680

Gentlemen:

Metals Applied is involved in the electroplating industry primarily in hard chrome, nickel sulfamate, cadmium and copper cyanide plating.

The cyanides listed in Section C are chemicals which are destroyed in our waste water pollution system. The I.I.I.trichlorethane that we might have to discard is reclaimed by the chemical solvent company we obtain the materials from.

Also, we have been in contact with Cecos Intl., Inc. as advised by the Local E.P.A. manager to set up a satisfactory system of disposal of our waste products such as the chrome sludge generated by our waste water treatment system.

Lead is the substance referred to in Section E as toxic. We generate a very limited amount of waste as such. We have Cecos Intl., Inc. handling the disposal of this material.

Our waste water treatment system was manufactured by DMP Corporation. The system is incorporated around the Coordinator 1000 controler which is a graphic electronic system controller including treatment alarms in all reactors, high levels and equalizing sumps.

A. Treatment not properly performed shuts down the waste transfer pumps to the reactor which is an alarm.

B. Alarm occurs if reagent feed fails or is overwhelmed.

C. Alarm occurs if reactor mixers fail or transfer pumps fail to pressurize their corresponding line.

D. 30 gal./minute treatment system

E. Continuous treatment system
   1. Cyanide destruction
   2. Chrome reduction
   3. Metallic precipitation through neutralization

The system encompasses sludge collection and dewatering equipment.

For any further information, please call me at 216-241-5913.

Sincerely,

Timothy A. Aish

Timothy Aish
Manager, Quality Assurance
Metals Applied, a subsidiary of
Cleveland Pneumatic Co.

TA/mh

D. Corrective Action

Copy
Rec'd 10/30/92

OCT 14 1992

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Crepeau
Ohio Environmental Protection Agency
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-1049

Re: Confidential Business Information
Claim
Metals Applied Corporation
OHD 004 173 621

Dear Mr. Crepeau:

Enclosed is a Preliminary Assessment/Visual Site Inspection for the above-referenced facility for your files. The Executive Summary and Conclusions and Recommendations sections are "enforcement confidential" and should not be released to the public. Metals Applied Corporation has exerted a claim of confidential business information (CBI) for a portion of the information contained in the report. Therefore, the procedures for CBI should be followed.

If you have any questions, please contact me at (312) 886-2884.

Sincerely yours,

Francene D. Harris
MN/OH Technical Enforcement Section
RCRA Enforcement Branch

Enclosure

cc: David Sholtis, OEPA (w/out enclosure)

HRE-8J:FHARRIS:6-2884:10/14/92:GENCOR\CREPEAU.CBI

| OFFICIAL FILE COPY |

RCRA ENFORCEMENT INIT. DATE	REB STAFF	REB SECTION CHIEF	REB CHIEF
	FH 10/14/92	10/14/92	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

January 25, 1993

Mr. John Owens
Metals Applied, Inc.
2800 East 33rd Street
Cleveland, Ohio 44115

Re: Visual Site Inspection
Metals Applied, Inc.
Cleveland, OH
ID No. OHD 004 173 621

Dear Mr. Owens:

As indicated in the letter of introduction sent to you on February 25, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Francene D. Harris for

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

METALS APPLIED, INC. FACILITY
CLEVELAND, OHIO
OHD 004 173 621

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 004 173 621
Date Prepared	:	October 7, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH3C
Prepared by	:	PRC Environmental Management, Inc. (Dana Mun)
Contractor Project Manager	:	(Shin Ahn)
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

NOTE: Representatives of the Metals Applied facility claim that some information contained in this report is proprietary. Metals Applied asks that this report be treated confidentially.

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Metals Applied, Inc. (Metals Applied) facility in Cleveland, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Metals Applied facility operates a metal finishing facility for various aircraft parts. Metal finishing operations include electroplating preparation, electroplating, and polishing. The facility generates and manages the following waste streams:

- Spent halogenated solvents (F001)
- Spent steel shot (D006 and D008)
- Plating masking tape wastes (D002, D006, D007, D008, F007, F008, and F009)
- Spent stripping solutions (D002, D006, D007, D008, F008, and F009)
- Spent plating solutions (D002, D006, D007, D008, F007, F008, and F009)
- Rinse waters (D002, D006, D007, D008, F007, and F009)
- Tank bottoms and plating bath sludges (F006 and F008)
- Wastewater treatment sludge (F006)
- Spent paint filters (D006)
- Spent solvents (D001, F003, and F005)
- Hazardous waste solids (D006 and D007)

The facility has operated at its current location since August 1980. The facility occupies 4.5 acres in an industrial area and employs 70 to 80 people. Cleveland Pneumatic Company leased the facility including equipment in December 1979 and began operation in August 1980. Currently, the building and the land are owned by J&H Realty. Ohio Corporation owned Metals

Applied before Cleveland Pneumatic Company, and F&M Plating Company is believed to have operated the facility before Cleveland Pneumatic Company (Metals Applied, 1992c). Past owners had used the facility for plating operations (Ruehmann, 1992).

Currently, the facility's regulatory status is that of a large-quantity generator. Metals Applied operated under interim status as a storage facility from 1980 to 1983. In 1983, the facility began closure of its former drum storage area under RCRA and changed its RCRA status to that of a large-quantity generator only, storing hazardous wastes on site for less than 90 days. In 1985, OEPA approved the Metals Applied facility's closure of its former drum storage area and change in RCRA status.

The PA/VSI identified the following nine SWMUs at the facility:

Solid Waste Management Units

1. Baghouses
2. Satellite Accumulation Areas
3. Hazardous Waste Drum Storage Area
4. Flammable Waste Drum Storage Area
5. Chrome Plating Waste Holding Tanks
6. Cadmium Plating Waste Holding Tanks
7. Copper Plating Waste Holding Tanks
8. Nickel Plating Overflow Pits
9. Wastewater Treatment Unit
10. Former Drum Storage Area
11. Two Temporary Drum Storage Areas

The potential for releases of hazardous constituents from this facility to ground water, surface water, air, and on-site soils is low. SWMUs 1 through 9 have adequate containment. Metals Applied closed SWMU 10 in 1983, when the facility's status changed to that of a generator only, storing waste for less than 90 days. Metals Applied used SWMU 10 for less-than-90-day storage until 1987, when SWMU 11 became operational. The facility used SWMU 11 until 1990, when SWMU 3 became operational. No releases from the facility have been documented.

Receptors of potential releases from the facility include on-site workers, nearby residents, and the Cuyahoga River. The Cuyahoga River is located approximately 2,000 feet west of the facility and is used for recreational and industrial purposes. Two intermittent streams, Kingsbury Run and Burk Branch, are located approximately 1.5 miles east and 2 miles south of the facility,

respectively. No sensitive environments, such as critical wildlife habitats, national parks, or wetlands, are located within 2 miles of the facility.

The Cleveland area obtains its water supply from Lake Erie. Ground water near the facility is not used for drinking water or industrial purposes. Eight wells are located within 2 miles of the facility. Two wells used as test wells are located 0.4 mile north of the facility. Information on the use of the other wells was not available. The residents nearest to the facility are within 0.5 mile. Access to the facility is controlled by fences and security guards.

Because of the low potential for release of hazardous constituents from this facility, PRC recommends no further action at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Metals Applied, Inc. (Metals Applied) facility in Cleveland, Ohio. The PA was completed on March 3, 1992. PRC gathered and reviewed information from Ohio EPA (OEPA) central and northeast district offices and from EPA Region 5 RCRA files. The VSI was conducted on March 5, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. Eleven SWMUs were identified at the facility; no AOCs were identified.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and 11 inspection photographs are included in Attachment B. Copies of field notes from the VSI are included as Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Metals Applied facility is located at 2800 East 33rd Street in Cleveland, Cuyahoga County, Ohio (latitude 41°28'0"N and longitude 81°40'0"W), as shown in Figure 1. The facility occupies 4.5 acres in an industrial area.

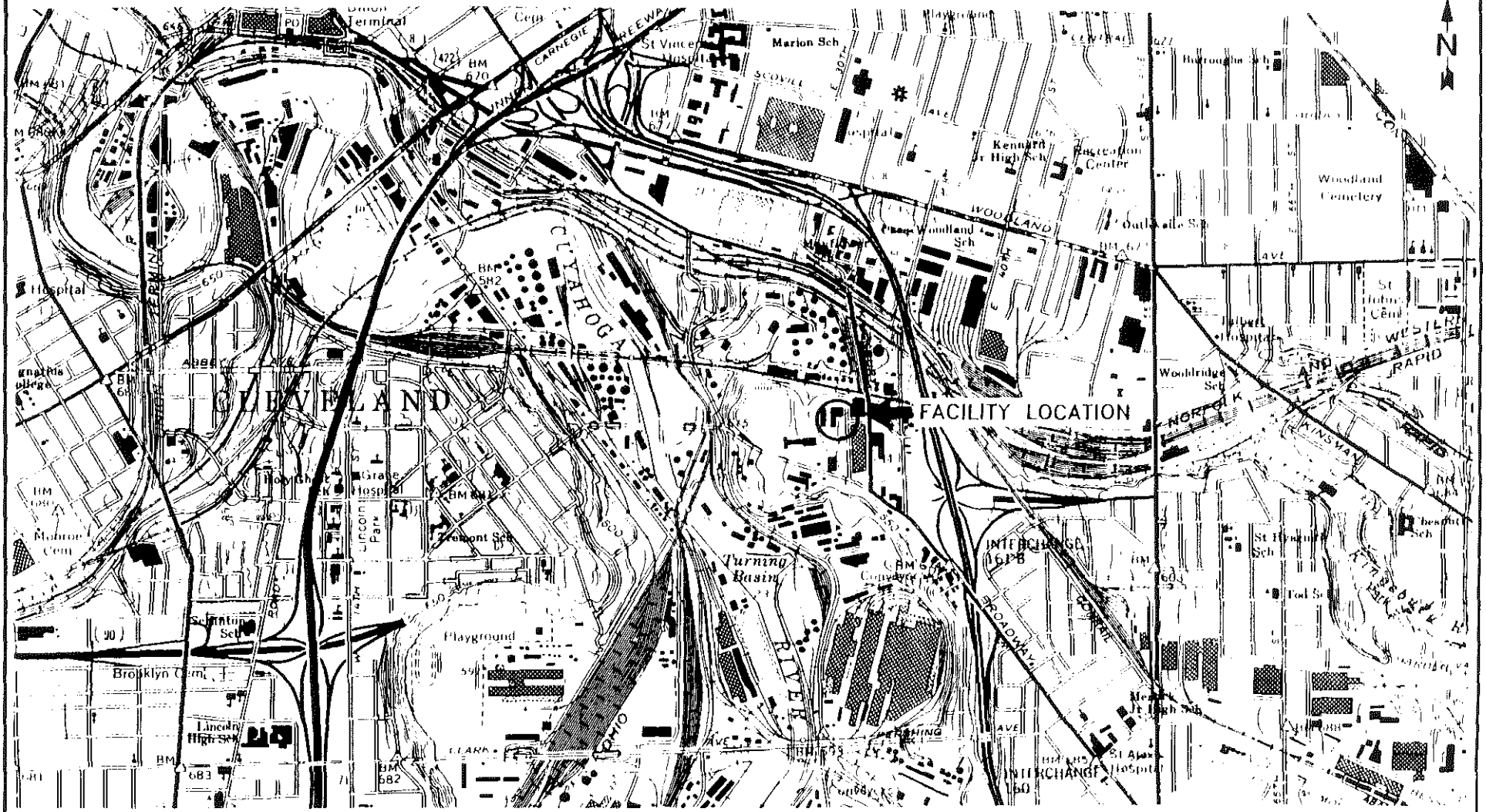
The facility is bordered on the north by an open field and Research Oil Company. Erie-Lackawanna Railroad tracks pass through the open field between the Metals Applied facility and Oil Research Company. The facility is bordered on the west by Grainger Materials, Inc., on the south by Consolidated Freightways Company, and on the east by several industries, including Strand Steel, Today Steel, Reliance Electric, Vitex Corporation, and Johnson Salvage. Most of the ground surface on the site is paved with asphalt, and some portions are covered with gravel (PRC, 1992) (Metals Applied, 1992c).

2.2 FACILITY OPERATIONS

Metals Applied, Inc., a subsidiary of Cleveland Pneumatic Company, operates a metal finishing facility for various aircraft parts. Metal finishing operations include electroplating preparation, electroplating, and polishing. The aircraft parts are prepared for plating through degreasing, shot peening, sandblasting, and masking procedures. Degreasing solvents are used to remove protective oils from the parts. Then the parts are either shot peened or sandblasted to refine the surface. Before the aircraft parts are sent to the electroplating department, masking tape is applied to the areas where plating is not desirable (Metals Applied, 1992c).

The next operation is electroplating. Electroplating uses electric current to coat surfaces of base materials with metal. The facility has four types of plating operations: chrome, cadmium, copper, and nickel. The plating operations are carried out in batch tanks (vats) with volumes ranging from 700 to 800 gallons. These vats are situated over sunken concrete vaults, or overflow

MICHELE.DWG - 4/2/92 - MLB



SCALE 1:24,000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE: 1" = 2,000'

SOURCE: MODIFIED FROM USGS, 1984

Metals Applied, Cleveland, Ohio

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

pits. The vats in the nickel plating department are situated over two overflow pits. Steel grids provide a walking surface around the vats in all plating departments (PRC, 1992).

Each plating department consists of vats for stripping, plating, and rinsing, with only a slight variation in the configurations of the vats. Parts first are immersed in a stripping solution (typically sulfuric or nitric acid solutions) to remove impurities from the base metal and prepare the surfaces for electroplating. Parts then are rinsed in a water bath before being immersed in the appropriate plating solution for electroplating exposed surfaces. In the chrome plating operation, sulfuric-hydrofluoric solution is used as the stripping solution, and chromic acid is used as the plating solution. The chrome plating departments are divided into two sections by a degreasing station (PRC, 1992). The cadmium and copper plating departments use cadmium-cyanide and copper-cyanide plating solutions. In the cadmium plating department, nitric acid is used as the stripping solution. In the nickel plating department, sulfuric-hydrofluoric solution is used as the stripping solution, and electroless nickel plating solution and nickel sulfamate are used as the plating solutions.

The electroplated aircraft parts are sent to a magnetic inspection booth for inspection. After the magnetic inspection, the parts are sent to a polishing department, if needed, where parts are polished and painted. Paint filters are cleaned with solvents and reused until spent. The facility also uses absorbent material such as "Floor Dry" to clean up small liquid spills (Metals Applied, 1992c).

The facility has operated at its current location since 1980 and employs 70 to 80 people. The facility consists of two buildings with total area of 93,720 square feet. The main building (building 1) has two floors. The degreasing, sandblasting, shot peening, electroplating, and polishing process areas, wastewater treatment unit, and cafeteria are located on the first floor. Administrative offices and various storage areas for raw materials and electric supply are located on the second floor. A smaller building (building 2) contains the magnetic inspection booth, general inspection area, and raw material storage areas.

Dusts generated during the shot peening or sandblasting operation are collected in baghouses (SWMU 1) outside building 1. Satellite accumulation areas (SWMU 2) are located throughout the processing areas on the first floor in building 1. Spent halogenated solvent generated during the degreasing operation, plating masking tape waste generated during the masking operation, and material from the cleanup of small spills are collected in 55-gallon drums

in these areas. Full drums of these wastes are transferred either to the hazardous waste drum storage area (SWMU 3) or to the flammable waste drum storage area (SWMU 4), located in building 2, before disposal off site.

Stripping and plating solutions are reused in all plating departments until the solutions become spent. Spent solutions are pumped either to a tank truck or to drums for disposal. Drums of stripping and plating solutions are transferred to the hazardous waste drum storage area (SWMU 3) before disposal offsite.

When the stripping and plating solutions become spent, tank bottoms and plating bath sludges are dewatered by sump pumps and pumped to drums. Drums of the sludge are transferred to the hazardous waste drum storage area (SWMU 3) before disposal off site (Metals Applied, 1992c).

Rinse waters generated by all plating departments are pumped to the wastewater treatment unit (SWMU 9). Residual spills contained in overflow pits are pumped by sump pumps to holding tanks (SWMUs 5, 6, and 7) and then are pumped to SWMU 9. Rinse waters containing cyanide - from cadmium and copper plating departments - are treated separately in SWMU 9. In the nickel plating department, there are no holding tanks, and spills from this plating department are contained by two overflow pits (SWMU 8) and then pumped to SWMU 9.

In the polishing department, paint filters are cleaned with solvent and reused until they become spent. Spent nonhalogenated solvent and spent paint filters are collected in satellite accumulation drums (SWMU 2). Full drums of these wastes are transferred to the flammable waste drum storage area (SWMU 4) before they are transported to a reclamation facility.

Rinse waters from stripping and electroplating rinse baths are treated by neutralization in the wastewater treatment unit (SWMU 9). Rinse waters from the cadmium and copper plating rinse baths contain cyanide and are treated separately, first by precipitation of cyanide from the wastestream and then by neutralization. Particles and treated waters are separated in a clarifier. The particles leave the clarifier as sludge and are sent to a filter press for dewatering. The de-watered sludge (sludge cake) is collected in drums and stored in the hazardous waste drum storage area (SWMU 3) before disposal off site (PRC, 1992). Treated wastewater is discharged to the combined sewer system managed by the Northeast Ohio Regional Sewer District (NEORSD) (Mack, 1992).

Facility SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2.

From 1980 to 1983, the Metals Applied facility operated a drum storage area located outside building 1 (now known as the former drum storage area or SWMU 10). Drums of wastes from the satellite accumulation areas were stored in SWMU 10 before disposal off site. Metals Applied began closure of this drum storage area in December 1983. In 1985, OEPA acknowledged the facility's closure of this drum storage area and the facility's change in status to that of a generator only, storing waste for less-than-90 days. Metals Applied used this drum storage area for less-than-90-day storage until 1987. The facility then used two temporary drum storage areas (SWMU 11) that were located on the loading docks on the northwest and southwest side of building 1 until 1990, when SWMU 3 and SWMU 4 became operational. The area, on the northwest was used to store drums containing flammable waste; the other area, on the southwest, was used to store drums containing other hazardous waste.

Cleveland Pneumatic Company leased Metals Applied from J&H Realty in December 1979 and began operation in August 1980. Ohio Corporation owned Metals Applied before Cleveland Pneumatic Company. F&M Plating Company is believed to have operated the facility before Ohio Corporation (Metals Applied, 1992c). Past owners also had used the facility for metal plating operations (Ruehmann, 1992). Metals Applied purchased building 2 a few years ago. Currently, the building and the land are owned by J&H Realty (Metal Applied, 1992c).

2.3 WASTE GENERATING PROCESSES

The primary wastestreams generated at the Metals Applied facility are spent steel shot, plating masking tape wastes, spent solvents, spent stripping solutions, spent plating solutions, rinse waters, tank bottoms and plating bath sludge, and wastewater treatment sludge. These wastes are generated from the electroplating preparation, electroplating, and polishing operations. Wastes generated at the facility are discussed below and are summarized in Table 2. Annual generation rates presented in this section are based on 1990 and 1991 waste generation data.

The aircraft parts are prepared for plating through degreasing, shot peening, sandblasting and masking procedures. In the degreasing operation, trichloroethylene (TCE) is used as a degreasing solvent to remove protective oils from the parts. Spent TCE, a halogenated solvent

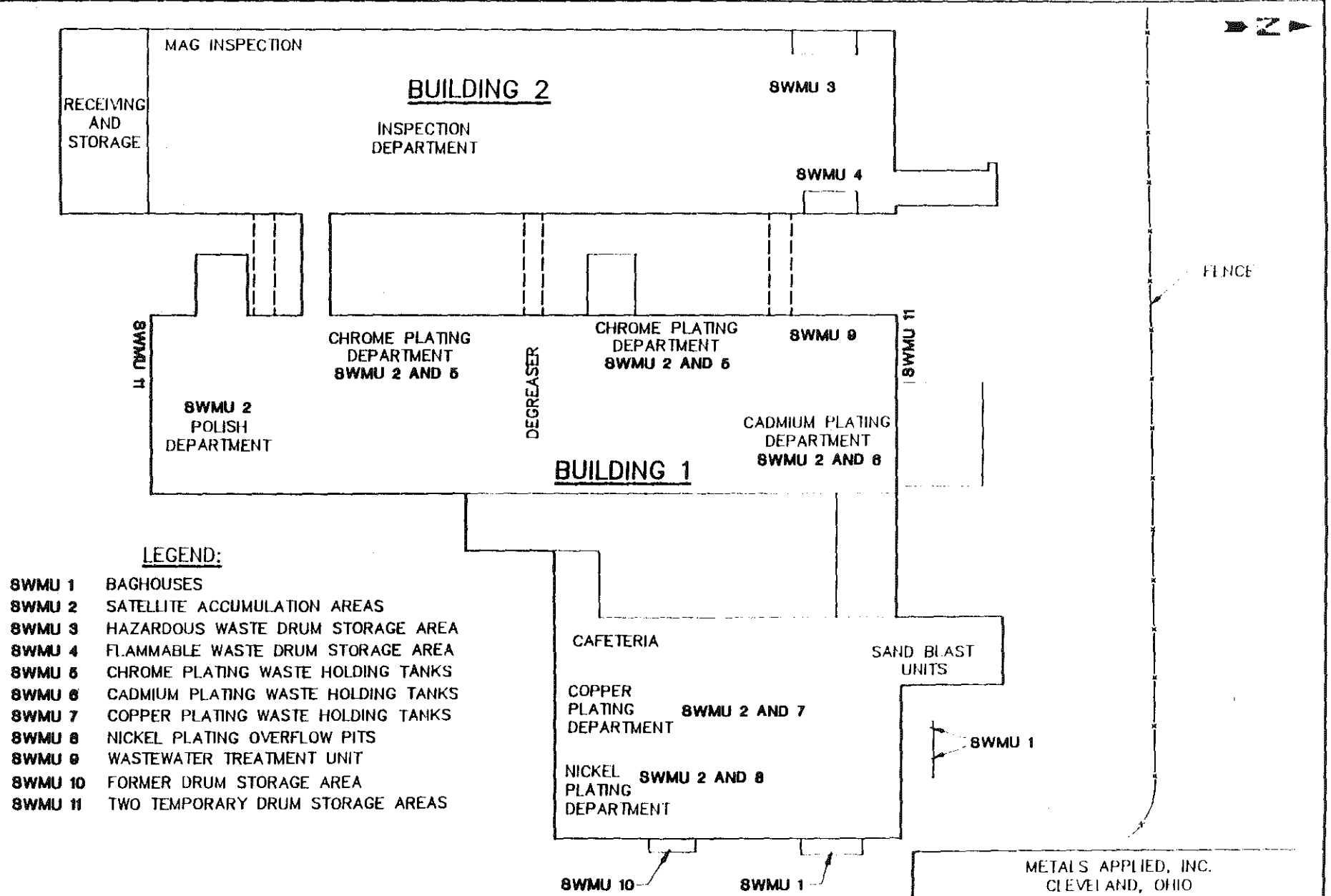
TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Baghouses	No	Active
2	Satellite Accumulation Areas	No	Active
3	Hazardous Waste Drum Storage Area	No	Active, less than 90-day storage
4	Flammable Waste Drum Storage Area		
5	Chrome Plating Waste Holding Tanks	No	Active
6	Cadmium Plating Waste Holding Tanks	No	Active
7	Copper Plating Waste Holding Tanks	No	Active
8	Nickel Plating Overflow Pits	No	Active
9	Wastewater Treatment Unit	No	Active
10	Former Drum Storage Area	Yes	Closed in 1985
11	Two Temporary Drum Storage Areas	No	Inactive

NOTE:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



LEGEND:

SWMU 1	BAGHOUSES
SWMU 2	SATELLITE ACCUMULATION AREAS
SWMU 3	HAZARDOUS WASTE DRUM STORAGE AREA
SWMU 4	FLAMMABLE WASTE DRUM STORAGE AREA
SWMU 5	CHROME PLATING WASTE HOLDING TANKS
SWMU 6	CADMIUM PLATING WASTE HOLDING TANKS
SWMU 7	COPPER PLATING WASTE HOLDING TANKS
SWMU 8	NICKEL PLATING OVERFLOW PITS
SWMU 9	WASTEWATER TREATMENT UNIT
SWMU 10	FORMER DRUM STORAGE AREA
SWMU 11	TWO TEMPORARY DRUM STORAGE AREAS

METALS APPLIED, INC.
CLEVELAND, OHIO

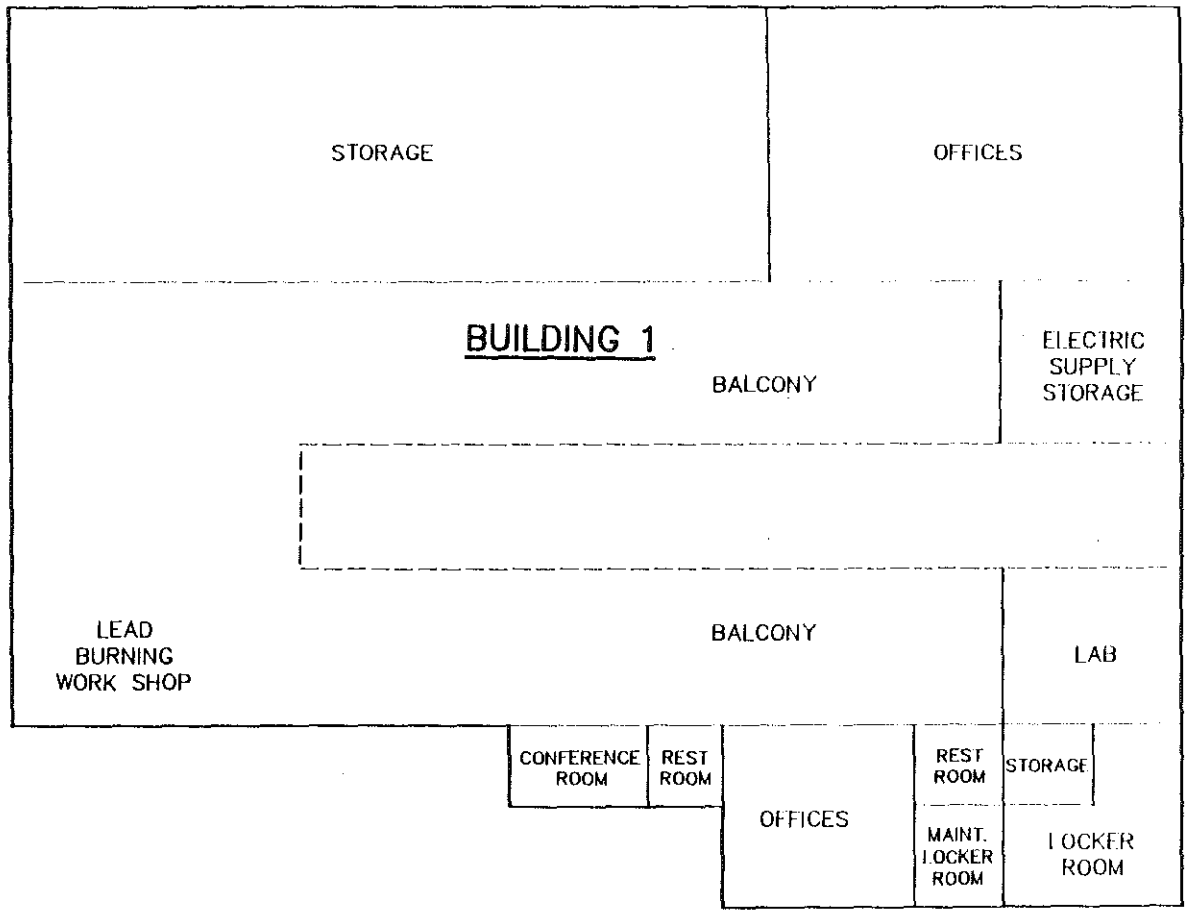
FIGURE 2a

FACILITY LAYOUT - FIRST FLOOR

SOURCE: MODIFIED FROM METALS APPLIED, INC., SKETCH RECEIVED BY PRC ON APRIL 15, 1992

NOT TO SCALE

PRC ENVIRONMENTAL MANAGEMENT, INC



METALS APPLIED, INC.
CLEVELAND, OHIO

FIGURE 2b

FACILITY LAYOUT -- SECOND FLOOR

PRC ENVIRONMENTAL MANAGEMENT, INC

NOT TO SCALE

SOURCE: MODIFIED FROM METALS APPLIED, INC., SKETCH RECEIVED BY PRC ON APRIL 15, 1992

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Spent halogenated solvent/F001	Degreasing operation	SWMUs 2 and 4
Spent steel shot/D006 and D008	Shot peening operation	SWMUs 1 and 3
Spent aluminum oxide dust/D006 and D008	Sandblasting operation	SWMUs 1 and 3
Plating masking tape wastes/D002, D006, D007, D008, F007, F008, and F009	Masking operation	SWMUs 2 and 3
Spent chrome stripping solution/D002, D007, and D008	Chrome plating operation	SWMU 3
Spent chrome plating solution/D006	Chrome plating operation	SWMU 3
Chrome rinse water/D002, D006, D007, and D008	Chrome plating operation	SWMUs 5 and 9
Spent cadmium stripping solution/D006 and D007	Cadmium plating operation	SWMU 3
Spent cadmium-cyanide plating solution/D006 and F007	Cadmium plating operation	SWMU 3
Cadmium rinse water/F007	Cadmium plating operation	SWMUs 5 and 9
Spent copper stripping solution (F008 and F009)	Copper plating operation	SWMU 3
Spent copper-cyanide plating solution/F0007 and F008	Copper plating operation	SWMU 3
Copper rinse water/D006, D007, D008 and F009	Copper plating operation	SWMUs 7 and 9
Spent nickel stripping solution/D002, D0067, and D007	Nickel plating operation	SWMU 3
Spent nickel plating solution/D007 and D008	Nickel plating operation	SWMU 3
Nickel rinse water/D002	Nickel plating operation	SWMUs 8 and 9
Tank bottoms and plating bath sludges/F006 and F008	Cleaning of plating vats	SWMU 3
Wastewater treatment sludge/F006	Wastewater treatment	SWMUs 3 and 9
Spent paint filters/D006	Polishing operation	SWMUs 2 and 4
Spent nonhalogenated solvent/D001, F003, and F005	Polishing operation	SWMUs 2 and 4
Hazardous waste solids/D006 and D007	Spill cleaning process	SWMUs 2 and 3

Notes:

* Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

(EPA waste code F001), is accumulated in 55-gallon drums in satellite accumulation areas (SWMU 2). Full drums are transferred to the flammable waste drum storage area (SWMU 4) before transport off site. About 800 gallons of this waste are generated annually (Metals Applied, 1991). This waste is transported off site to a reclamation facility by either Chemical Solvents, Inc. or North East Chemical Corporation (Metals Applied, 1992c).

The shot peening operation consists of machines that use steel shot or sand to refine the surface of the aircraft parts. The shot peening process generates spent steel shot that contains cadmium and lead (D006 and D008). This waste is collected in baghouses (SWMU 1) mounted on the north and northeastern walls of building 1. About 130,000 pounds of this waste are generated annually and transported offsite by Alchemtron to a disposal facility (Metals Applied, 1992a). The sandblasting operation generates spent aluminum oxide dust (D006 and D008). This waste also is collected in baghouses (SWMU 1). About 300,000 pounds of this waste are generated annually and stored in the hazardous waste drum storage area (SWMU 3) before transported offsite by Alchemtron for disposal (Metals Applied, 1991).

In the masking operation, masking tape is applied to the areas of the aircraft parts where electroplating is not desired. After electroplating, plating masking tape wastes drenched with plating solutions (D002, D006, D007, D008, F007, F008, and F009) are generated. The facility transfers the waste into 55-gallon drums and then sends the drums to the hazardous waste drum storage area (SWMU 3) before the wastes are transported offsite by Alchemtron for disposal (OEPA, 1984b).

Each plating department - chrome, cadmium, copper, and nickel - uses vats for stripping, plating, and rinsing. Each plating operation generates spent stripping solutions, spent plating solutions, tank bottoms and plating bath sludges, and rinse waters. The spent stripping solutions and spent plating solutions are pumped either to a tank truck or to drums for disposal. When spent stripping and plating solutions are pumped out of vats, residual tank bottoms and plating bath sludges remain. Sump pumps are used to remove as much liquid as possible, and the tank bottoms and plating bath sludges then are placed in drums. Drums of spent stripping solutions, spent plating solutions, and tank bottoms and plating bath sludge are transferred to the hazardous waste drum storage area (SWMU 3) before they are transported off site by Alchemtron for disposal. Drums of the wastes containing cyanide are stored and handled separately. About 30,000 pounds of tank bottoms and plating bath sludges (F006 and F008) are generated annually (Metals Applied, 1991).

Rinse waters generated by the plating departments are pumped to the wastewater treatment unit (SWMU 9). In the chrome, cadmium, and copper plating departments, residual spills contained within the overflow pits are collected in holding tanks by sump pumps, and then the material in the holding tanks is pumped to SWMU 9. In the nickel plating department, there are no holding tanks. Residual spills contained within overflow pits are pumped to SWMU 9. In SWMU 9, rinse waters containing cyanide (generated by the cadmium and copper plating operations) are treated separately.

The chrome plating departments annually generate approximately 3,000 gallons of spent chrome stripping solution (D002, D007, and D008), and 5,000 gallons of spent chrome plating solution (D002, D006, and D007). About 24,000 gallons of rinse water (D002, D006, D007, and D008) are generated annually by the chrome plating departments (Metals Applied, 1991).

The cadmium plating department annually generates approximately 650 gallons of spent cadmium stripping solution (D006 and D007) and 3,000 gallons of spent cadmium-cyanide plating solution (D006 and F007). About 3,000 gallons of rinse water containing cyanide (F007) are generated annually by the cadmium plating department (Metals Applied, 1991).

The copper plating department annually generates approximately 1,500 gallons of spent copper stripping solution (F008 and F009) and 1,300 gallons of spent copper-cyanide plating solution (F007 and F008). About 5,500 gallons of rinse water containing cyanide (D006, D007, D008, and F009) are generated annually by the copper plating department (Metals Applied, 1991).

The nickel plating department annually generates approximately 3,000 gallons of spent nickel stripping solution (D002, D006, and D007) and 1,400 gallons of spent nickel plating solution (D007 and D008). About 2,000 gallons of rinse water (D002) are generated annually by the nickel plating department (Metals Applied, 1991).

Rinse waters from the electroplating operations are treated by neutralization in the wastewater treatment unit (SWMU 9). Rinse waters from the cadmium and copper plating rinse baths contain cyanide and are treated separately first by precipitation of cyanide from the wastestream, then by neutralization. Treated waters are separated from particles in a clarifier before being discharged to the NEORSD system. The operation of the wastewater treatment unit generates sludge from the clarifier. The particles leave the clarifier as sludge and are sent to a filter press for dewatering. Water from the filter press is recycled to the clarifier before

discharge. The annual generation of wastewater treatment sludge (F006) is approximately 46,000 pounds (Metals Applied, 1992a). The sludge is collected in drums and stored in the hazardous waste drum storage area (SWMU 3) before being transported off site by Alchemtron for disposal (OEPA, 1984b).

The polishing operation involves polishing and painting the aircraft parts. Spent paint filters (D006) from painting and spent nonhalogenated solvent (D001, F003, and F005) from cleaning filters are generated. About 800 pounds of spent paint filters and 170 gallons of spent nonhalogenated solvent are generated annually (Metals Applied, 1992a). Drums of spent nonhalogenated solvent and spent paint filters are accumulated in SWMU 2 and are stored in the flammable waste drum storage areas (SWMU 4) before they are transported off site by either Chemical Solvents, Inc. or North East Chemical Corporation for reclamation (Metals Applied, 1992c).

The facility also generates hazardous waste solids (D006 and D007) from the cleanup of miscellaneous spills. Absorbent solids are used to clean up small spills of plating solutions. About 30,000 pounds of this waste are generated annually (Metals Applied, 1991). The waste solids are placed in drums in the satellite accumulation areas (SWMU 2); then the drums are transferred to the hazardous waste drum storage area (SWMU 3) before they are transported off site by Alchemtron for disposal (OEPA, 1984b).

In the past, Metals Applied generated off-specification chemical wastes including copper cyanides (P029); sodium cyanide (P106); 1,1,1-trichloroethane (U226); trichloroethylene (U228); and soluble cyanide (P030) (Hazardous Waste Facility Approval Board [HWFAB], 1981a, 1981b). The chemical wastes (P029, P106, U226, U228, and P030) are no longer generated at the facility.

2.4 HISTORY OF DOCUMENTED RELEASES

No documented releases of hazardous wastes or hazardous constituents have been identified.

2.5 REGULATORY HISTORY

Metals Applied submitted a notification of hazardous waste activity to EPA on November 18, 1980. The facility submitted a RCRA Part A permit application on November 18, 1980

(Metals Applied, 1980). This application listed the following process codes and capacities: storage in containers (S01) for 11,000 gallons of spent solvents and spent plating solutions. Metals Applied submitted a revised Part A permit application on April 21, 1982 (Metals Applied, 1982). On July 14, 1982, OEPA approved the facility's revised Part A permit application (OEPA, 1982b). In the revised Part A permit application, the facility listed the following wastes (HWFAB, 1981b).

- Spent halogenated degreasing solvent (F001)
- Spent halogenated solvent (F002)
- Electroplating wastewater treatment sludge (F006)
- Spent cyanide plating bath solutions (F007)
- Plating bath residues (F008)
- Spent stripping and cleaning bath solutions (F009)

The following commercial chemical product hazardous wastes also were listed:

- Copper cyanides (P029)
- Sodium cyanide (P106)
- 1,1,1-trichloroethane (U226)
- Trichloroethylene (U228)
- Soluble cyanide (P030)

The revised Part A permit application excluded waste that had been delisted by EPA (F017, waste paints).

Cleveland Pneumatic Company leased the facility from J&H Realty in December 1979 and began operation in August 1980. Ohio Corporation owned Metals Applied before Cleveland Pneumatic Company. F&M Plating Company is believed to have operated the facility before Ohio Corporation (Metals Applied, 1992c). Past owners also had used the facility for metal plating operations (Ruehmann, 1992). Currently, the facility and the land are owned by J&H Realty.

The Metals Applied facility currently operates as a hazardous waste generator. The facility states that its current hazardous waste activities are limited to less than 90-day storage.

On November 15, 1983, the facility submitted a closure plan for the former drum storage area and requested withdrawal of its Part A permit (Metals Applied, 1983a). In December, 1983, the facility closed the former drum storage area in accordance with the specifications in the closure plan. On January 9, 1984, Metals Applied submitted a closure certification for the former drum storage area (Metals Applied, 1983b). On April 1, 1985, OEPA acknowledged the facility's closure of the former drum storage area and the facility's change in status from a storage facility to a hazardous waste generator only (OEPA, 1985).

OEPA conducted RCRA compliance inspections in July 1981 (OEPA, 1981), July 1982 (OEPA, 1982a), January 1983 (OEPA 1983a), and January 1984 (OEPA 1984a). Inspectors noted violations related to security measures (1981 and 1982), the waste analysis plan, owner or operator inspections, personnel training records, the contingency plan, management of containers of reactive wastes (1981 and 1983), chemical and physical waste analysis, and the closure plan (1983). On April 12, 1983, OEPA reinspected the Metals Applied facility and noted general compliance; violations noted during the inspection on January 10, 1983 had been addressed (OEPA, 1983b). In addition, the RCRA compliance inspection reports from 1981 and 1983 identified the facility as a storage facility, but in 1982 the facility was identified as a generator only. This notation appears to be an error, because Metals Applied did not complete the closure of the drum storage area until December 1983.

Metals Applied has various units, such as the shot peening machine, sandblasting cabinet, plating vats, and vapor depressor, that generate air emissions. (Metals Applied, 1992c). The facility provided a list of various air emission sources which have air permits.

Metals Applied does not have any underground storage tanks.

Metals Applied is not required to have a National Pollutant Discharge Elimination System (NPDES) permit. The facility discharges industrial wastewater to the combined storm water/sanitary sewer system under an Administrative Order from NEORSD (NEORSD, 1991; Mack, 1992).

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Synpro facility.

2.6.1 Climate

The climate in Cuyahoga County is continental. The average daily temperature is 50 degrees Fahrenheit. The lowest average daily temperature is 27°F in January. The highest average daily temperature is 72°F in July. In summer, northern areas nearest Lake Erie are markedly colder than the rest of the county. The average relative humidity in mid-afternoon is about 60 percent. The total average annual precipitation for the county is 35 inches. The mean annual lake evaporation is about 31 inches (U.S. Geological Survey [USGS], 1978). The 1-year, 24-hour maximum rainfall is 4.0 inches. The prevailing wind is from the southwest. Average wind speed is highest in January at 13 miles per hour from the southwest (U.S. Soil Conservation Service [USSCS] 1980).

Precipitation is well distributed during the year. Sixty percent of the total annual precipitation usually falls from April to September. Snow squalls are frequent from late fall through winter, and total snowfall normally is heavy. Crop development early in the growing season is slowed by frequent cool winds from Lake Erie. Fall winds that blow from a relatively warm Lake Erie delay the first fall freeze and prolong the growing season for all crops. The average growing season in Cuyahoga County is about 225 days (USSCS, 1980).

2.6.2 Flood Plain and Surface Water

Surface waters at the site appear to drain into a combined sewer system operated by the city of Cleveland; collection drains are located throughout the facility. Off-site surface waters off-site also drain into this system. The nearest surface water, Euclid Creek, is located approximately 1.5 miles east of the facility and is used for recreational purposes. Euclid Creek discharges to Lake Erie. Lake Erie is located 1.75 miles northwest of the facility. The facility is not located in the 100-year flood plain (U.S. Geological Survey, 1974).

2.6.3 Geology and Soils

Site-specific geology and soil information is not available; therefore, regional information is presented. Cuyahoga County is located in two physiographic provinces: the glaciated Allegheny Plateau of the Appalachian Plateau Province to the south and east, and the Eastern Lake and Till Plains section of the Central Lowland Province to the west and north. The line of demarcation between the two provinces is the Portage Escarpment, which runs northeast to southwest, just north of Cleveland. Topography in the Allegheny Plateau is characterized by mature river valleys, while the Central Lowland topography is controlled predominately by thick glacial deposits. Bordering Lake Erie is the Lake Plain area, a narrow strip averaging 4 miles in width and composed of lacustrine and beach ridge deposits (Leverett and Horn, 1931; White, 1982).

Two general classes of deposits exist: glacially derived, unconsolidated deposits of Quaternary age and consolidated sandstone and shale of Paleozoic age. During the Pleistocene epoch of the Quaternary period, several glaciers advanced and retreated in the region. The last glacial advances and retreats during the Wisconsinan stage occurred in two distinct lobes: the Killbuck Lobe to the west and the Cuyahoga Lobe to the east (Leverett and Horn, 1931; White, 1982). Specific glacial units discussed will not be correlated to a specific lobe because several of the units were synchronous deposits and have the same general characteristics.

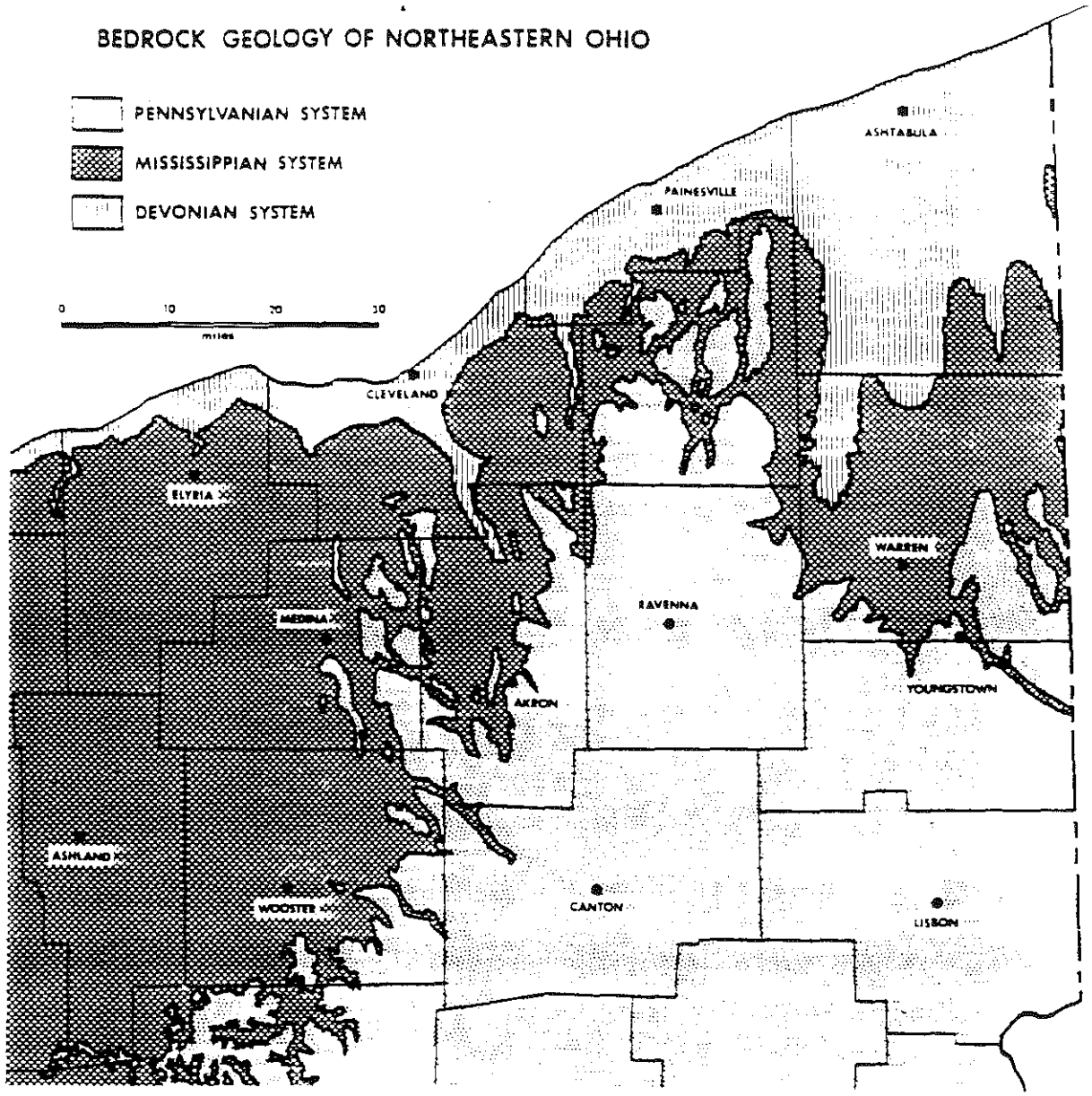
Associated with the glacial deposits are glacial outwash deposits of sand and gravel that are located predominately in valleys and on valley sides. The majority of the glacial deposits are heterogenous, and they may contain discontinuous lenses and thin sheets of sand and gravel (White, 1982). Glacial deposits in the area range in thickness from 0 to 300 feet. South of the Lake Plain area, the upper most unit, the Hiram Till, is exposed. The Hiram Till is a clay till that ranges in thickness from 0 to more than 30 feet. The Kent-Navarre Till underlies the previous unit; it is composed of clayey sand and silt that ranges in thickness from 0 to 100 feet. The last Wisconsin age unconsolidated unit in the area is the Mogadore-Millbrook Till, which is also composed of clayey sand and silt (Banks and Feldmann, 1970; White, 1982). Pre-Wisconsin age tills and outwash deposits unconformably overlie the bedrock in deep depressional surfaces, such as buried bedrock valleys. The Pre-Wisconsin deposits are discontinuous across northeastern Ohio. These deposits are more than 60 feet thick in parts of Cuyahoga County and provide large quantities of high-grade gravel in the Mill Creek valley (White, 1982).

The bedrock units dip slightly to the south and south-southeast at about 20 feet per mile (Leverett and Horn, 1931). Devonian age bedrock is exposed in the subcrop and along river valleys along Lake Erie. Bedrock units become progressively younger to the south (Figure 3). The uppermost bedrock unit is the Sharon Conglomerate of the Pottsville Group of Pennsylvanian age. It is approximately 0 to 150 feet thick. Underlying this unit is the Cuyahoga Group of Mississippian age, which is approximately 160 to 425 feet thick and is composed primarily of blue to gray shale, with alternating beds of sandy shale and sandstone. Figure 4 shows these formations as they occur under the Cleveland area (Williams, 1940). Underlying the Cuyahoga Group is the Berea Sandstone, which ranges in thickness feet from 5 to 150. The Berea Sandstone overlies the Bedford Shale, which is composed of firm-to-soft gray siliceous shale, ranging in thickness from 50 to 90 feet. This formation overlies the Ohio Shale of Devonian age, which is more than 400 feet thick. The Ohio Shale formation is predominately black carboniferous shale, with beds of greenish-gray shale. Underlying this unit is a series of older Paleozoic era limestones, and sandstones and shales (Leverett and Horn, 1931; Banks and Feldmann, 1970; White, 1982).

The soils in the area around the site are of the Urban Land - Elnora - Jimtown association. This soil association is characterized by broad flats on lake plains, terraces, and beach ridges. The soils are nearly level, but there is some undulation. This association is about 45 percent Urban land 15 percent Elnora soils, 10 percent Jimtown soils, and 30 percent soils of minor extent.

Urban land consists of areas that are covered by streets, parking lots, buildings, and other structures that so obscure or alter the soils that identification is not feasible. Elnora soils are nearly level, moderately well drained, and course textured, they are on lake plains. Elnora soils have moderately rapid or rapid permeability. They have a seasonal high water table at a depth of 18 to 24 inches. Jimtown soils are nearly level, somewhat poorly drained, and medium textured. These soils are on terraces and beach ridges. They have moderate permeability and a seasonal high water table at a depth of 12 to 30 inches.

Minor soils in this association are the Chili and Bogart soils on outwash and stream terraces. The Glenford and the Fitchville soils are on terraces and in basins of former glacial lakes. The Haskins soils are on terraces and beach ridges.



Source: Modified from Banks and Feldman, 1970

Metals Applied, Cleveland, Ohio

FIGURE 3
BEDROCK GEOLOGY OF
NORTHEASTERN OHIO

ENVIRONMENTAL MANAGEMENT, INC.

The main land-use limitations are the seasonal wetness, possible contamination of groundwater supplies, and drought conditions in summer. Most areas have been drained by sewer systems, gutters, and subsurface drains (USSCS, 1980).

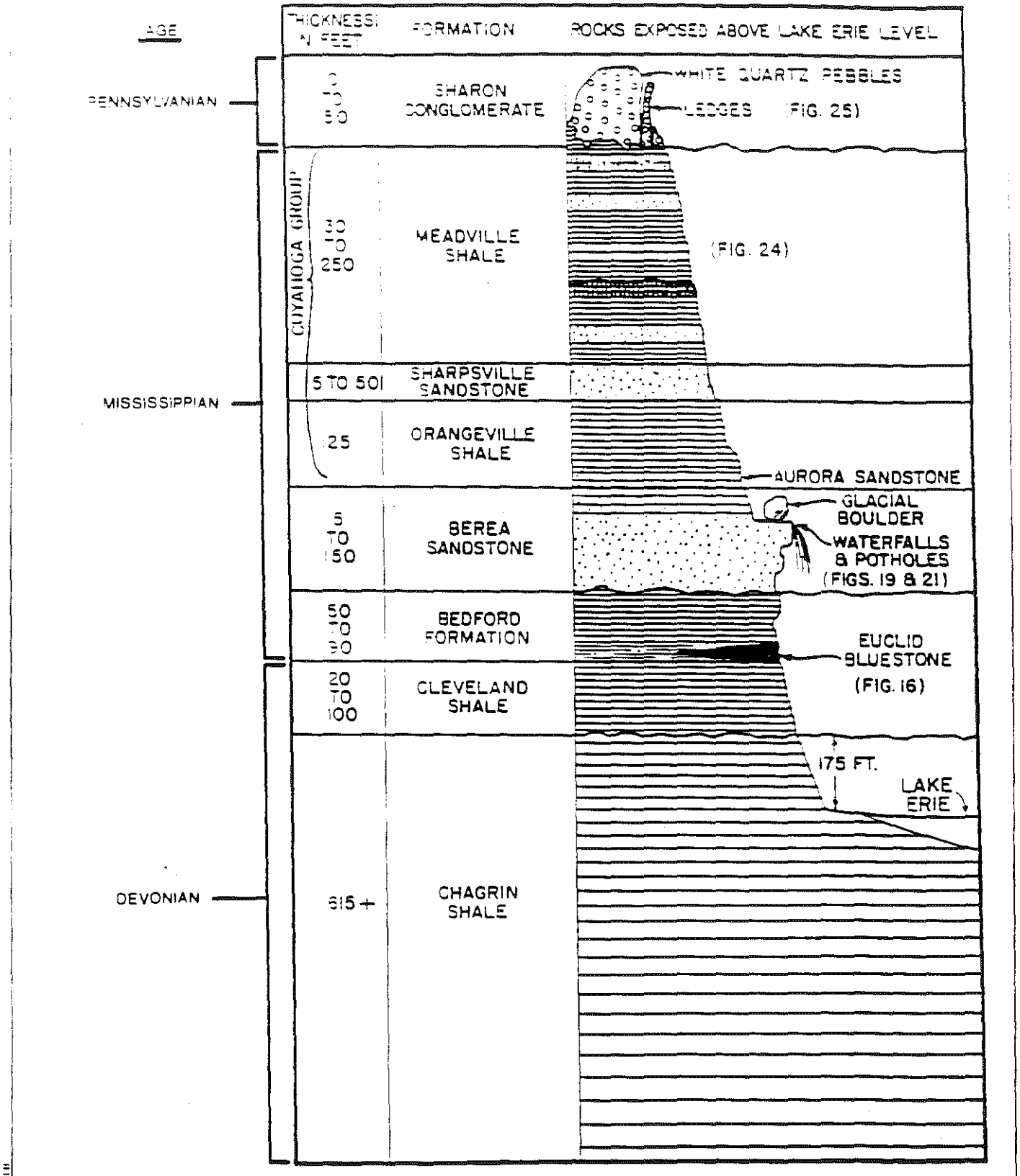
2.6.4 Ground Water

Site-specific ground water information not is available; therefore, regional information is presented. The use of ground water in the county is limited to water-bearing formations within the bedrock, alluvial and glacial outwash deposits found mostly in valleys, and, to a lesser extent, sand and gravel lenses and sheets associated with the glacial drift. Existing valleys generally contain thick deposits of sand and gravel from glacial outwash. Wells in these deposits can yield up to 500 gpm. The glacial outwash has an estimated hydraulic conductivity of 10^{-3} to 10^{-1} cm/sec (Bloyd, 1974; Fetter, 1988).

The glacial deposits also may be a source of groundwater where the deposits overlie the Ohio Shale, especially where the drift is thick and contains a large percentage of sand (Leverett and Horn, 1931). The hydraulic conductivity for such aquifers is estimated to be less than 10^{-3} cm/sec (Bloyd, 1974). Water-bearing formations within the Paleozoic bedrock include the Sharon Conglomerate and Berea Sandstone. Both aquifers have an estimated hydraulic conductivity 10^{-3} to 10^{-8} cm/sec; wells in these units can yield from 25 to 100 gpm (Bloyd, 1974; Freeze and Cherry, 1979). Generally, local ground water flow in shallow glacial aquifers is controlled by surface topography and discharges into nearby rivers or lakes. The regional ground water flow in the bedrock most likely is toward the Appalachian Basin to the south (Bloyd, 1974).

2.7 RECEPTORS

The Metals Applied facility occupies 4.5 acres in an industrial area in Cleveland, Ohio. Cleveland has a population of about 530,000. The facility is bordered on the north by an open field and Research Oil Company. Erie-Lackawanna Railroad passes through the open field between the Metals Applied facility and Oil Research Company. The facility is bordered on the west by Grainger Materials, Inc., on the south by Consolidated Freightways Company, and on the east by several industries (Metals Applied, 1992c; PRC, 1992). The nearest schools, Mayflower School and Case Woodland School, are located 1/2 mile north of the facility (USGS, 1984). The nearest residents to the facility are 1/2 mile to the north. Facility access is controlled by fences and security guards.



SOURCE: MODIFIED FROM WILLIAMS, 1940

Metals Applied, Cleveland, Ohio

FIGURE 4

REPRESENTATIVE GEOLOGIC CROSS-SECTION OF THE CLEVELAND AREA

PRC ENVIRONMENTAL MANAGEMENT, INC.

The nearest surface water body, the Cuyahoga River, is located 2,000 feet west of the facility and is used for recreational and industrial purposes. Other surface-water bodies in the area include two intermittent streams: Kingsbury Run, located approximately 1-1/2 miles east of the facility, and Burk Branch, located approximately 2 miles south of the facility. These streams flow westward and ultimately discharges to Cuyahoga River.

Ground water near the facility is not used for drinking water or industrial purposes. Eight wells are located within a 2-mile radius of the site. Two of these wells are used as test wells and are located 0.4 mile north of the facility. Information about the use of the other wells was not available (ODNR, 1992). The Cleveland area obtains its water supply from Lake Erie.

No sensitive environments, such as critical wildlife habitats, national parks, or wetlands, are located on site or within 2 miles of the facility. Two recreational parks are located within 2 miles of the facility: Kingsbury Run Park, southeast of the facility, and Washington Park, south of the facility (USGS, 1984).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the nine SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations. Figure 2a shows the SWMU locations.

SWMU 1	**Baghouses**
Unit Description:	Three baghouses are located outside of building 1. One baghouse is mounted on the north wall, and the other two on the northeast wall. These baghouses are made of steel. Two 55-gallon drums are located below each baghouse to collect dust. The drums are situated on wooden pallets set on the paved ground. One storm drain, approximately 8 inches in diameter, is situated approximately 12 feet north of the baghouse on the north wall (see Photograph Nos. 1 and 2) (PRC, 1992).
Date of Startup:	The baghouses on the northeast wall began operation in 1980; the one on the north wall began operation in 1987.
Date of Closure:	The unit is active.
Wastes Managed:	The unit collects dust generated during the shot peening or sandblasting operation. Spent steel shot (D006 and D008), and spent aluminum oxide dust (D006 and D008) are collected in the drums. Full drums are transferred to the hazardous waste drum storage area (SWMU 3) before shipment offsite.
Release Controls:	The baghouses are fully enclosed units that discharge from a chute at the bottom. A plastic sleeve is placed around the bottom of the chute and the top of the drums to minimize release of particles to the air.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	The baghouses and drums appeared to be in good condition. Drums under the baghouse on the north wall are situated on concrete that slopes toward the wall to provide a small containment area (see Photograph No. 1). The drain located in this area leads to the combined sewer system. No evidence of release was noted.
SWMU 2	**Satellite Accumulation Areas**
Unit Description:	The satellite accumulation areas are located indoors within the operation areas. Several accumulation areas are used to collect small

amounts of hazardous and nonhazardous wastes. Two 55-gallon drums each are located in the chrome, cadmium, and copper plating areas and in the masking area. One drum is used to accumulate hazardous wastes and another is used to collect nonhazardous wastes. Only one 55-gallon drum is located in the nickel plating area; it is used to collect hazardous wastes. There are drums in the polishing department that collect spent paint filters and spent solvent. Plating masking tape wastes are collected in 18-gallon drums that are cut from 55-gallon drums situated next to plating vats (see Photograph Nos. 3, 4, and 5) (PRC, 1992). Drums are situated on concrete floors. No floor drains are located near the satellite accumulation areas.

Date of Startup: The unit began operation in 1977 and 1978.

Date of Closure: The unit is active.

Wastes Managed: The drums in these areas collect hazardous spent solvents, plating masking tape wastes, spent paint filters, spilled material, and nonhazardous wastes. The hazardous wastes include spent halogenated solvents (F001), plating masking tape wastes (D002, D006, D007, D008, F007, F008 and F009), spent paint filters (D006), spent nonhalogenated solvent (D001, F003 and F005) and spilled material cleaned up with absorbent material (D006 and D007). The Metals Applied facility transfers full drums of hazardous wastes, except spent solvents to the hazardous waste drum storage area (SWMU 3). Drums of spent solvents are transferred to the flammable waste drum storage area (SWMU 4).

Release Controls: The walls and floors of the building serve as containment. The floors are poured concrete and the walls are cement block. The joints between the concrete floor and walls appeared to be intact.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: The drums in the satellite accumulation areas appeared to be in good condition. No major cracks in the floor and walls were observed. No evidence of release was noted.

SWMU 3 **Hazardous Waste Drum Storage Area**

Unit Description: The hazardous waste drum storage area is located in the north end of building 2, against the west wall. The unit is used to store drums of other hazardous wastes, such as dusts, plating masking tape, wastes, spent stripping and plating solutions, and sludges. The drums of wastes are transferred to this area from the satellite accumulation areas (SWMU 2). Drums stand on the concrete floor. No floor drains are near the unit (see Photograph Nos. 6 and 7) (PRC, 1992). Inventories of raw materials such as plating solutions

and other chemicals are stored adjacent to the unit, outside the fence.

Date of Startup: The unit began operation in 1990.

Date of Closure: The unit is active.

Wastes Managed: The unit stores the following wastes: spent steel shot (D006 and D008); spent aluminum oxide dust (D006 and D008); plating masking tape waste (D002, D006, D007, D008, F007, F008, and F009); spent chrome stripping solution (D002, D007, and D008) and spent chrome plating solution (D006); spent cadmium stripping solution (D006 and D007) and spent cadmium/cyanide plating solution (D006 and F007); spent copper stripping solution (F008 and F009) and spent copper/cyanide plating solution (F007 and F008), spent nickel stripping solution (D002, D006, and D007) and spent nickel plating solution (D007 and 008) tank bottoms and plating bath sludges (F006 and F008); wastewater treatment sludge (F006); and hazardous waste solids (D006 and D007). Drums of wastes are stored for less than 90 days before shipment off site by Alchemtron.

Release Controls: The unit is enclosed by fences. The floors and wall provide containment. The floor is poured concrete and the walls are cement block. There are no floor drains in this part of the building.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: The unit contained drums of hazardous wastes. The joints between the floors and walls appeared to be intact. The drums in this area appeared to be in good condition. No evidence of release was noted.

SWMU 4 **Flammable Waste Drum Storage Area**

Unit Description: The flammable waste drum storage area is located in the north end of building 2, against the east wall and opposite SWMU 3. This unit is used to store drums of flammable wastes from degreasing and polishing operations. The drums of waste are transferred to this area from the satellite accumulation areas (SWMU 2). No floor drains are near the unit (PRC, 1992).

Date of Startup: The unit began operation in 1990.

Date of Closure: The unit is active.

Wastes Managed: The unit stores spent halogenated solvents (F001), spent paint filters (D006), and spent nonhalogenated solvents (D001, F003, and F005). Drums of the waste are stored for less than 90 days before shipment

	offsite and are transported offsite by either Northeast Chemical Corporation or Chemical Solvents, Inc. for reclamation.
Release Controls:	The unit is enclosed by fences. The walls and floors of the building serve as containment. The floors are poured concrete and the walls are cement block. The joints between the concrete floor and walls appear to be intact.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	The drums in the flammable waste drum storage area appeared to be in good condition. No major cracks in the floor and walls were observed. No evidence of release was noted.
SWMU 5	**Chrome Plating Waste Holding Tanks**
Unit Description:	The chrome plating waste holding tanks are situated below the vats in the chrome plating departments. The unit consists of open round tanks used for containment of overflow from vats of stripping and plating rinse waters and spilled material collected in the overflow pits. The tanks are inside a sunken concrete vault used as an overflow pit. The capacity of the holding tanks is not known but the holding tanks can hold the volume contained in the rinsing vats. The overflow pit east of the degreasing station is 17 feet wide, 23 feet long, and 2 1/4 feet deep. The other overflow pit west of the degreasing station is 72 feet wide, 23 feet long, and sloping from 6.5 to 13.1 feet deep. The overflow pits are made of concrete. No floor drains were noted in the floors of the vaults.
Date of Startup:	It is estimated that this unit began operation in 1980.
Date of Closure:	The unit is active.
Wastes Managed:	The unit collects chrome rinse water (D002, D006, D007, and D008) from the stripping and plating rinse vats in the chrome plating departments. The waste is pumped from this unit to the wastewater treatment unit (SWMU 9).
Release Controls:	Any leaks or spills from the holding tanks are contained by the concrete overflow pits and are pumped back into the holding tanks and then to the wastewater treatment unit (SWMU 9). The overflow pits do not have floor drains.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	It was difficult to observe the condition of the overflow pits and the surrounding area due to the depth of the pits, the congested arrangement of equipment, and the inadequate lighting. Facility representatives indicated that the pits did not have floor drains.

SWMU 6	**Cadmium Plating Waste Holding Tanks**
Unit Description:	The cadmium plating waste holding tanks are situated below the vats in the cadmium plating department. The unit consists of open round tanks used for containment of overflow from vats of stripping and plating rinse waters and spilled material collected in the overflow pit. The capacity of the holding tanks is not known, but the holding tanks can hold the volume contained in the rinsing vats. Stripping vats have their own containment to collect any overflow caused by malfunction. The containment tanks are attached to the vats and made of steel. The capacity of the tanks is 2,000 gallons each. The overflow pit is 34 feet wide, 23 feet long, and 13.2 feet deep. The overflow pit is made of concrete. No floor drains were noted in the floor of the vault (see Photograph No. 9) (PRC, 1992).
Date of Startup:	It is estimated that this unit began operation in 1980.
Date of Closure:	The unit is active.
Wastes Managed:	The unit collects rinse water (F007) from the stripping and plating rinse vats in the cadmium plating department. The waste is pumped from this unit to the wastewater treatment unit (SWMU 9).
Release Controls:	Any leaks or spills from the holding tanks are contained by the concrete overflow pit and are pumped back into the holding tanks and then to the wastewater treatment unit (SWMU 9). Any spills from the stripping vats due to the malfunction will be contained by closed tanks attached to the vats in this plating department. The overflow pit does not have floor drains.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	It was difficult to observe the condition of the overflow pit and the surrounding area due to the depth of the pit, the congested arrangement of equipment, and the insufficient lighting. Facility representatives indicated the pit did not have floor drains.
SWMU 7	**Copper Plating Waste Holding Tanks**
Unit Description:	The copper plating waste holding tanks are situated below the vats in the copper plating department. The unit consists of open round tanks used for containment of overflow from vats of stripping and plating rinse waters and spilled material collected in the overflow pit. The tanks are inside a sunken concrete vault used as an overflow pit. The capacity of the holding tanks is not known but the holding tanks can hold the volume contained in the rinsing vats. The overflow pit is 16 feet wide, 20 feet long, and 12 feet deep (Metals Applied, 1992c). The overflow pit is made of concrete. No floor drains were noted in the floor of the vault (PRC, 1992).

Date of Startup:	It is estimated that this unit began operation in 1980.
Date of Closure:	The unit is active.
Wastes Managed:	The unit collects rinse water (D006, D007, D008, and F009) from the stripping and plating rinse vats in the copper plating department. The waste is pumped from this unit to the wastewater treatment unit (SWMU 9).
Release Controls:	Any leaks or spills from the holding tanks are contained by the concrete overflow pit and are pumped back into the holding tanks and then to the wastewater treatment unit (SWMU 9). Any spills from the stripping vats due to the malfunction will be contained by closed tanks attached to the vats in this plating department. The overflow pit does not have floor drains.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	It was difficult to observe the condition of the overflow pit and the surrounding area due to the depth of the pit, the congested arrangement of equipment, and the inadequate lighting. Facility representatives indicated that the pits did not have floor drains.
SWMU 8	**Nickel Plating Overflow Pits**
Unit Description:	Two nickel plating overflow pits are located below the vats in the nickel plating department. The nickel plating department does not have rinse water holding tanks like those the other plating departments have. The unit is used for containment of overflow from vats of stripping and plating rinse waters and spilled material. Both overflow pits are 5 feet wide, 31 feet long, and 2 feet deep. The overflow pits are made of concrete. Stripping vats have their own containment to collect any spills due to malfunction. The containment tanks are attached to the vats and made of steel. The capacity of the tanks is 2,000 gallons each. No floor drains were noted in the floors of the vaults.
Date of Startup:	It is estimated that this unit began operation in 1980.
Date of Closure:	The unit is active.
Wastes Managed:	The unit collects rinse water (D002) from the stripping and plating rinse vats in the nickel plating department. The waste is pumped from this unit to the wastewater treatment unit (SWMU 9).
Release Controls:	Any leaks or spills from the vats are contained by the concrete overflow pits and are pumped to the wastewater treatment unit (SWMU 9). Any spills from the stripping vats due to malfunction

will be contained by closed tanks attached to the vats in this plating department. The overflow pits do not have floor drains.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: It was difficult to observe the condition of the overflow pit and the surrounding area due to the depth of the pits, the congested arrangement of equipment, and the inadequate lighting. Facility representatives indicated that the pits did not have floor drains.

SWMU 9 **Wastewater Treatment Unit**

Unit Description: This unit is located in the northwest corner of building 1. The unit is used to treat rinse waters from the chrome, cadmium, copper, and nickel plating departments. The unit is 17 feet wide by 45 feet long. Three holding vessels stand on a steel deck along one side of the wall. A 550-gallon vessel used to treat rinse waters containing acid is made of polyethylene; a 800-gallon vessel used to treat rinse waters containing cyanide is made of rubber-lined stainless steel; and a 1,200-gallon sludge holding tank used to separate sludge from the effluent is made of fiberglass (Metals Applied, 1992c). A filter press for sludge dewatering stands on a concrete floor below the holding vessels (see Photograph Nos. 10 and 11). There is a floor drain approximately 3 feet north of the unit (PRC, 1992).

Date of Startup: The unit began operation on July 14, 1980.

Date of Closure: The unit is active.

Wastes Managed: The unit treats rinse waters generated by the plating operations in the plating departments. The wastes include: chrome rinse water (D002, D006, D007, and D008); cadmium rinse water (F007); copper rinse water (D006, D007, D008, and F009); and nickel rinse water (D002). Neutralized rinse waters and the treated solutions are sent to a clarifier, where the liquid (effluent) and particles are separated. Rinse waters that contain cyanide are treated separately, first to precipitate the cyanide; these rinse waters then are neutralized and dewatered with other rinse waters. The effluent discharges to a combined storm-water and sewer system managed by NEORSD (Mack, 1992; PRC, 1992). The separated particles (sludge) are dewatered with a filter press. Water from the filter press is recycled the clarifier. The dewatered sludge (F006) is placed in 55-gallon drums and stored in the hazardous waste drum storage area (SWMU 3).

Release Controls: There is no secondary containment other than the walls and floor of the building. A floor drain is located approximately 3 feet north of the unit. The floor drain leads directly to the combined storm-water/sewer system managed by NEORSD. NEORSD ultimately

discharges treated wastewater (effluent) to the Cuyahoga River (Mack, 1992).

History of Documented Releases: No releases from this SWMU have been documented.

Observations: The holding vessels and the filter press appeared to be in good condition. No evidence of release was noted. The floor appeared to be clean.

SWMU 10 **Former Drum Storage Area**

Unit Description: The former drum storage area was located outside on the east side of building 1. The unit was used to store drums of hazardous waste. It is not known whether the facility stored flammable wastes separately, but it is likely that the waste was stored separately from other hazardous waste. The unit consisted of a concrete pad. The unit measured 15 feet wide by 50 feet long. After the closure of this unit in 1983, the facility used this unit to store drums of hazardous wastes for less than 90 days.

Date of Startup: It is estimated that this unit began operation in 1980.

Date of Closure: The unit was closed in December 1983 according to a closure plan approved by OEPA; OEPA approved the closure of the unit in 1985. From 1984 to 1987, the unit was used to store drums of hazardous waste for less than 90 days.

Wastes Managed: The unit stored drums of hazardous wastes; however, information on the specific wastes was not available. The unit probably stored wastes similar to those stored in SWMUs 3 and 4.

Release Controls: This unit was situated on a concrete pad, but no secondary containment such as berms was observed during the VSI.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: No drums containing wastes were present in the former drum storage area during the VSI. No evidence of release was noted. Holes in the concrete were observed around the boundary of the unit; the holes appeared to be for fence posts.

SWMU 11 **Two Temporary Drum Storage Areas**

Unit Description: Two temporary drum storage areas were located on the loading docks on the southwest and northwest ends of building 1. The area on the northwest end was used to store drums containing flammable wastes, while the other area, on the southwest, was used to store

	drums containing other hazardous wastes after the former drum storage area (SWMU 9) had been closed.
Date of Startup:	This unit became operational in 1987.
Date of Closure:	The unit became inactive in 1990.
Wastes Managed:	The unit stored drums of hazardous wastes; however, information on the specific wastes stored there was not available. The unit on the southwest probably stored wastes similar to those in SWMU 3; the other unit, on the northwest, probably stored spent solvent (D001, F003, and F005) and spent paint filters (D006), now stored in SWMU 4.
Release Controls:	This unit was situated on concrete pads in two areas, but no secondary containment, such as berms, was observed during the VSI.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	No drums containing wastes were present in the two temporary drum storage areas during the VSI. No evidence of release was noted.

4.0 AREAS OF CONCERN

PRC did not identify any AOCs during the PA/VSI. The preliminary assessment did not reveal any specific information on past releases in areas not otherwise identified as SWMUs, and no AOCs were discovered during the VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified eleven SWMUs and no AOCs at the Metals Applied facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 summarizes the SWMUs at the Metals Applied facility and recommended further actions.

SWMU 1 **Baghouses**

Conclusions: The facility operates three baghouses to collect dusts generated during shot peening and sandblasting operations. The unit has been active since 1980. The baghouses are fully enclosed units that discharge from a chute at the bottom. Two 55-gallon drums are below each baghouse exhaust to collect dust. The top of each drum is sealed with plastic to prevent release of dust to the air. The drums are located on the concrete floor. A storm drain is near the baghouse on the north. The potential for release of any spill to the storm drain is low, because the spill material is not in liquid form; the concrete under the baghouse on the north side also slopes down away from the drain. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 2 **Satellite Accumulation Areas**

Conclusions: The satellite accumulation areas are located throughout the operation area. Several 55-gallon drums are on concrete floors and are used to accumulate spent solvents, spent paint filters, and spilled material. The unit has been active since 1977 and 1978. The concrete floor and walls of the building provide containment. No floor drains in the satellite accumulation areas were observed during the VSI. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU SUMMARY

	SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Baghouses	1980 - Present 1987 - Present	None	None
2.	Satellite Accumulation Areas	1977 - Present	None	None
3.	Hazardous Waste Drum Storage Area	1990 - Present	None	None
4.	Flammable Waste Drum Storage Area	1990 - Present	None	None
5.	Chrome Plating Waste Holding Tanks	1980 - Present	None	None
6.	Cadmium Plating Waste Holding Tanks	1980 - Present	None	None
7.	Copper Plating Waste Holding Tanks	1980 - Present	None	None
8.	Nickel Plating Overflow Pits	1980 - Present	None	None
9.	Wastewater Treatment Unit	1980 - Present	None	None
10.	Former Drum Storage Area	1980 - 1987	None	None
11.	Two Temporary Drum Storage Areas	1987 - 1990	None	None

SWMU 3 **Hazardous Waste Drum Storage Area**

Conclusions: The hazardous waste drum storage area is inside building 2, at the north end. The unit is used to store drums of wastes from the satellite accumulation areas (SWMU 2), primarily spent stripping and plating solutions and sludges. The unit has been active since 1990. Access to the storage areas is restricted by fences. The concrete floor and walls of the building provide containment (PRC, 1992). No floor drain was observed during the VSI. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 4 **Flammable Waste Drum Storage Area**

Conclusions: The flammable waste drum storage area is in the north end of building 2. The unit is used to store spent solvents and spent paint filters transferred from the satellite accumulation areas (SWMU 2). The unit has been active since 1990. The concrete floor and walls of the building provide containment (PRC, 1992). No floor drain was observed during the VSI. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 5 **Chrome Plating Waste Holding Tanks**

Conclusions: The chrome plating waste holding tanks are inside sunken concrete vaults or overflow pits. Overflow from vats of stripping and plating rinse waters and spilled material contained in the overflow pits is collected in open tanks. The unit has been active since 1980. Any leaks or spills are contained by the overflow pits and are pumped to the holding tanks and to the wastewater treatment unit (SWMU 9). No floor drains were noted in the floors of the vaults. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 6 **Cadmium Plating Waste Holding Tanks**

Conclusions: The cadmium plating waste holding tanks also are inside an overflow pit. Overflow from vats of stripping and plating rinse waters and spilled material contained in the overflow pits is collected in open tanks. The unit has been active since 1980. Any leaks or spills are contained by the overflow pit and are pumped to the holding tanks and to the wastewater treatment unit (SWMU 9). No floor drains were noted in the floors of the vaults. No releases from this SWMU have been documented. This unit has

a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 7 **Copper Plating Waste Holding Tanks**

Conclusions: The copper plating waste holding tanks also are within an overflow pit. Overflow from vats of stripping and plating rinse waters and spilled material contained in the overflow pits are collected in open tanks. The unit has been active since 1980. Any leaks or spills are contained by the overflow pit and are pumped to the holding tanks and to the wastewater treatment unit (SWMU 9). No floor drains were noted in the floors of the vaults. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 8 **Nickel Plating Overflow Pits**

Conclusions: The nickel plating overflow pits are located below the vats. Overflow from vats of stripping and plating rinse waters and spilled material is contained the overflow pits. The unit has been active since 1980. Any leaks or spills are contained by the overflow pits and are pumped to the wastewater treatment unit (SWMU 9). No floor drains were noted in the floors of the vaults. Spills from the stripping vats due to malfunction will be contained by closed tanks attached to the vats. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this unit.

SWMU 9 **Wastewater Treatment Unit**

Conclusions: The wastewater treatment unit is inside building 1. This unit has been in use since 1980 to treat rinse waters generated by plating operations at the facility. Effluent from treatment discharges to the combined sewer system managed by NEORSD. The sludge generated is dewatered with a filter press. The sludge is placed in drums and stored in the hazardous waste drum storage area (SWMU 3) before being transferred off site. The walls and floor of the building provide containment. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 10 **Former Drum Storage Area**

Conclusions: The former drum storage area unit stored drums of hazardous waste. This unit began operation in 1980 and was closed in accordance with an approved closure plan in December 1983. After the closure, Metals Applied continued to use this unit as a storage area for less than 90-day storage. The unit probably stored wastes similar to those managed in SWMUs 3 and 4. The unit was on a concrete pad, but no secondary containment such as berms was observed during the VSI. Holes in the concrete were observed around the boundary of the unit; the holes appeared to be for fence posts. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this unit.

SWMU 11 **Two Temporary Drum Storage Areas**

Conclusions: The two temporary drum storage areas stored drums of hazardous and flammable wastes. This unit was in operation from 1987 to 1990. The unit probably stored wastes similar to those managed in SWMUs 3 and 4. This unit stood on concrete pads, but no secondary containment was observed around the boundary of the unit. No releases from this SWMU have been documented. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this unit.

REFERENCES

Banks, P.O., and Rodney M. Feldman, 1970. Guide to the Geology of Northeastern Ohio. Northern Ohio Geological Society.

Boyd, Jr., Richard M., 1974. Summary Appraisals of the Nation's Ground-Water Resources - Ohio Region, Geological Survey Professional Paper 813-A.

Cushing, H.P., Leverett, Frank, and Van Horn, Frank R., 1931. Geology and Mineral Resources of the Cleveland District, Ohio. U.S. Geologic Survey Bulletin 818.

Engineering Science (ES), 1990. Remedial Investigation Report for the Former TAPCO Facility, Euclid, Ohio, July.

Fetter, C.W., 1988. Applied Hydrogeology, 2nd Edition. Merrill Publishing Co., Columbus, OH. 592p.

Freeze, R.A. and John A. Cherry, 1979. Groundwater. Prentice Hall, Inc., Englewood, N.J. 591p.

Hazardous Waste Facility Approval Board (HWFAB), 1981a. Permit Application Review Sheet, September 29.

HWFAB, 1981b. Hazardous Waste Facility Installation and Operation Permit, December 28.

Leverett, Frank and Frank R. Van Horn, 1931. Geology and Mineral Resources of the Cleveland District, Ohio. U.S.G.S. Bulletin 818, 138p.

Mack, Bill, 1992. Northeast Ohio Regional Sewer District (NEORSD), Telephone Conversation with Dana Mun, PRC Environmental Management, Inc. (PRC), April 28.

Metals Applied, 1980. RCRA Part A Permit Application, November 18.

Metals Applied, 1982. Revised Treatment, Storage, and Disposal Facility (TSDF) RCRA Permit, April 27.

Metals Applied, 1983a. Letter to Ohio Environmental Protection Agency (OEPA) to request change of hazardous waste activity status from a storage facility to a generator; included closure plan for drum storage area, November 15.

Metals Applied, 1983b. Certification of the drum storage area closure from an independent registered professional engineer and Metals Applied corporate officer, December 28.

Metals Applied, 1991. 1990 Generator Annual Hazardous Waste Report, February 28.

Metals Applied, 1992a. 1991 Generator Annual Hazardous Waste Report, February 28.

Metals Applied, 1992b. Letter to U.S. EPA regarding the appropriateness of the VSI, March 4.

Metals Applied, 1992c. Written response to PRC's information request, April 15, May 11 and May 27.

Northeast Ohio Regional Sewer District (NEORSD), 1991. Administrative Order; industrial wastewater discharge, September 19.

Ohio Department of Natural Resources (ODNR), 1992. Groundwater Well Logs for cleveland Township in Cuyahoga County.

Ohio Environmental Protection Agency (OEPA), 1981. Annual RCRA inspection report, July 21.

OEPA, 1982a. Annual RCRA inspection report, July 7.

OEPA, 1982b. Interoffice communication from Division of Hazardous Materials Management (DHMM) to HWFAB regarding approval of the modification request for the RCRA TSDF permit to update and correct information on the hazardous waste list, July 14.

OEPA, 1983a. Annual RCRA inspection report, January 10.

OEPA, 1983b. Letter to Metals Applied regarding reinspection conducted on April 12 to determine compliance regarding violations noted during annual RCRA inspection conducted on January 10, April 21.

OEPA, 1984a. Annual RCRA inspection report, January 24.

OEPA, 1984b. Interoffice communication from the Northeast District Office (NEDO) of DHMM regarding Metals Applied's permit request, January 30.

OEPA, 1985. Letter to Metals Applied concerning its status as a generator, April 1.

PRC, 1992. Visual site inspection field notes, March 5.

Ruehmann, Albert, 1992. Cleveland Pneumatic Company, Telephone Conversation with Dana Mun, PRC, April 29.

Schmidt, James J., and Walker, Alfred C., 1954. The Ground Water Resources of the Areas in the Vicinity of the Interchanges on the East-West Ohio Turnpike. State of Ohio Department of Natural Resources Information Circular No. 5.

U.S. Geological Survey (USGS), 1974. Flood Prone Area Maps.

USGS, 1978. Summary Appraisals of the Nation's Ground-Water Resources -- Great Lake Region (Geological Survey Professional Paper 813-J).

USGS, 1984. Cleveland south quadrangle topographic map, Cuyahoga County, Ohio.

U.S. Soil Conservation Service (USSCS), 1980. Soil Survey of Cuyahoga County, Ohio.

Williams, Arthur B., 1940. Geology of the Cleveland Region. Cleveland Museum of Natural History, Pocket Natural History No. 9.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	[illegible]

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Metals Applied, Inc.	2800 East 33rd Street				
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Cleveland, Ohio	OH	44115	Cuyahoga	035	21
09 COORDINATES: LATITUDE 41°28'	LONGITUDE 081°40'				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

From downtown Cleveland, take East 30th Street south to Pittsburgh Avenue. Take East 34th Street west to Broadway. At the light, take East 33rd Street north. Metals Applied is at end of the street.

III. RESPONSIBLE PARTIES

01 OWNER *(If known)*	02 STREET *(Business, mailing residential)*		
Cleveland Pneumatic Company	3781 East 77th Street		
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Cleveland	OH	44105	
07 OPERATOR *(If known and different from owner)*	08 STREET *(Business, mailing, residential)*		
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP *(Check one)*

☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☒ A. RCRA 3010 DATE RECEIVED: 11/18/80 (MONTH DAY YEAR) ☒ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: 06 04 81 (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE _____ ☐ NO

BY *(Check all that apply)*

☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*

■ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1980 (BEGINNING YEAR) present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Metal finishing - electroplating operation generates spent steel shot, masking tape waste, spent solvents, spent stripping solutions, spent plating solutions, rinse water and plating sludges.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The potential for releases of hazardous constituents from this facility to ground water, surface water, air, and on-site soils is low. SWMUs 1 through 9 have adequate containment. SWMU 10 was closed when the facility changed its status to that of a generator only. The facility used SWMU 10 and 11 for less than 90-day storage until 1990 when SWMUs 3 and SWMU 4 became operational. No releases from this facility

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☒ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Dana Mun		PRC-EMI	(703) 556-2783	04/21/92 (MONTH DAY YEAR)

EPA FORM 2070-12(17-81)

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Metals Applied Facility
Cleveland, Ohio
OHD 00 4173 621

Date:	March 5, 1992
Facility Representatives:	Neil R. Harris Albert Ruehmann
Inspection Team:	Dana Mun, PRC Environmental Management, Inc. (PRC) Jim Styers, PRC
Photographer:	Jim Styers, PRC
Weather Conditions:	Calm, cloudy, temperature about 55°F
Summary of Activities:	The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the Metals Applied facility's past and current operations, solid wastes generated, and release history. Most of the information was exchanged on a question-and-answer basis. John Owens, who has the most knowledge about the facility's operation and compliance with regulations on hazardous wastes, was not present during the VSI. Metals Applied representatives stated that documents requested by PRC would be sent to PRC at a later date. The VSI tour began at 9:15 a.m. The inspected areas included the nickel plating room and operating areas for chrome, cadmium, and copper plating processes. These plating process areas contained vats with holding tanks in overflow pits. Satellite accumulation drums were located throughout the process areas. No floor drains were observed. PRC also inspected the wastewater treatment unit in the northwest corner of building 1. The unit contained three holding vessels to treat spent solutions sent from various plating operations. A filter press for wastewater treatment sludge de-watering was next to the holding vessels. In addition, a floor drain was observed that discharged to the Northeast Ohio Regional Sewer District. The hazardous waste drum storage area was at the north end of building 2. There were four areas near the gate for storage of inventories of plating solutions, incoming chemicals, cyanide sludge, and other hazardous wastes. Access to the cyanide sludge and other hazardous waste storage areas was restricted by fences. No floor drains were observed in this area. Three baghouses and two drums underneath each baghouse were located on the north wall and northeast wall outside building 1. These baghouses were used for dust collection from the shot peening and sandblasting operation. A storm drain was observed near the baghouse on the north wall. PRC also inspected the former drum storage area located outside on the northeast side near the two baghouses. The drum storage area was

on a concrete pad, but no release control such as a berm was observed. Access to this unit appeared to be limited by fences.

The tour concluded at 11:25 a.m., after which the inspection team held an exit meeting with the facility representatives. The VSI was completed and the inspection team left the facility at 11:25 a.m.

Photograph No. 1 **Location:** SWMU 1
Orientation: South **Date:** March 5, 1992
Description: Baghouse situated along the north wall of building 1; note the storm drain located near this unit.

Photograph No. 2 **Location:** SWMU 1
Orientation: West **Date:** March 5, 1992
Description: Two baghouses situated along the northeast wall of building 1.

Photograph No. 3 **Location:** SWMU 2
Orientation: East **Date:** March 5, 1992
Description: Satellite accumulation drums near shot peening machine; hazardous wastes are accumulated in black 55-gallon drums, and nonhazardous wastes are accumulated in the yellow drum.

Photograph No. 4 **Location:** SWMU 2
Orientation: East **Date:** March 5, 1992
Description: Satellite accumulation drum near the nickel plating operation; hazardous wastes, such as masking tape wastes, are accumulated in this 55-gallon drum.

Photograph No. 5 **Location:** SWMU 2
Orientation: West **Date:** March 5, 1992
Description: Satellite accumulation drum next to a plating tank; masking tape wastes are collected and transferred to the hazardous waste drum storage area (SWMU 3).

Photograph No. 6 **Location:** SWMU 3
Orientation: Northeast **Date:** March 5, 1992
Description: Hazardous waste drum storage area; drums of waste are stored within the area enclosed by the fence.

Photograph No. 7 **Location:** SWMU 3
Orientation: South **Date:** March 5, 1992
Description: Hazardous waste drum storage area; drums are sealed, labeled, and stored neatly in rows.

Photograph No. 8 **Location:** SWMU 4
Orientation: West **Date:** March 5, 1992
Description: Flammable waste drum storage area; drums are sealed, labeled, and stored neatly in rows.

Photograph No. 9 **Location:** SWMU 6
Orientation: North **Date:** March 5, 1992
Description: Cadmium plating waste holding tank (round tank). The tank is situated below the vats and within the overflow pit.

Photograph No. 10 **Location:** SWMU 9
Orientation: West **Date:** March 5, 1992
Description: Three holding vessels that make up the wastewater treatment unit

Photograph No. 11 **Location:** SWMU 9
Orientation: West **Date:** March 5, 1992
Description: Filter press used to dewater wastewater treatment sludge.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

DM 3/5/92.

PRC @ Metals Applied (MA)
Date: March 5, 1992
Weather: Cloudy, 55° F
PRC staff: Jim Styers & Dana Mun
MA: Neil R. Harris (He led the tour.)
Albert C. Ruehmann III

Bounded on north by another industry, (open field in portion at NW corner & gravel covered area inside the fence), river on the north,
All sides are surrounded by other industries.

4:00 Briefing ~~meeting~~ DM meeting
- hard chromium
  cadmium
  cyanide copper
  nickel
  ] - plating
- electroplating for airplane landing parts
- They don't think there is any UST ~~Tanks~~ DM

9:10 - They handle largest landing parts
- electroplating of steel
- 70-80 employees

9:15 Nickel room ~~Locked~~ DM
- nitric acid tank (to dilute sulfric acid)
- nitric acid to dissolve iron contained w/ iron
- Nitric sulfide Stripping tank
- spent bath, rinse water → waste
  ↳ drum ↳
- ~~nick~~ DM
- sulfuric acid bath
- concrete floor / not sure about floor drain
- Below these baths, there is containment (steel) → sump system ~~to prevent~~ in case of overflow
- Baths are on top of steel grid work separated bet. the containment

DM 3/5/92 45

Photo 1 + Sat. Acc. drum

Contents
- used paint bucket etc.
- paint wastes
- plating masking waste
- right at the entrance of the nickel room (on the left corner

9:30
- Copper tanks, rinse water, Copper Strip tanks
- Copper tank → heat treated
- 700 ~ 800 gal.
- rinse water waste goes to down and eventually to cyanide pit
- ~~Shopping machine~~ DM (Shot Peen mach)
- They generate dusts during operation
- compress stress + (cast steel shot)
- Shot ~~Peen~~ DM machine (Shot Peen machine)
- ~~Beam~~ Peen shot
- same as ~~st~~ DM above

DM 3/5/92 46

~~Shot machine~~ DM
- ~~Stress resistance wh~~ = DM

Photo 2 near the Shot Peen machine
- Sat. acc. drum
- Spent wastes
- particles contaminated w/ metals
- chromium
- Alumina machine
- chrome plating
- oxide-free operation
- sand processing
- Vacuum coating machine (coating machine)
- Vap. aluminum parts
- coat aluminum under vacuum
- Ivadizer
- recycle any aluminum residuals
- They don't think it's hazardous.

DM 3/5/92

47

Cadmium ~~be~~ DM Tanks (baths)

- Titanium cadmium
- Plain Cadmium
- Rinse tanks (4)
- Chromic acid neutralization tank
- Chromate & nitric acid bath
- Cyanide bath
- rinse water waste go to a pit below the steel grid collecting in a tank (open tank)
- All these tanks are extended downward for containment

- Cyanide overflow pit

Photo 3 → Rinse water collecting pit

Photo 4 → masking tape waste storage drum (cut open drum 1/3 of the size)

DM 3/5/92

48

Filter tank

- Clean the filter in the same way ~~as~~ DM w/ other process and collect rinse water in a pit
- reuse filters

• Next these tanks from (p47) masking waste collecting drum
- used gloves etc.

• Raw material storage drums in the corner
- for treatment
- Sodium hypochlorite, sulfuric acid
- products

• He thinks waste water treatment discharges to Cleveland Treatment Plant.

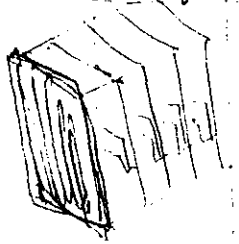
• Acid overflow tanks below Photo 5
- leaking acid will be pumped up from the pit to the wastetreatment plant

DM 3/5/92 49

Photo 60 7 - unknown containment tanks

- Cyanide treatment - Sodium hypochlorite
  - big green filter cake comes out
- Below these tanks - no floor drains

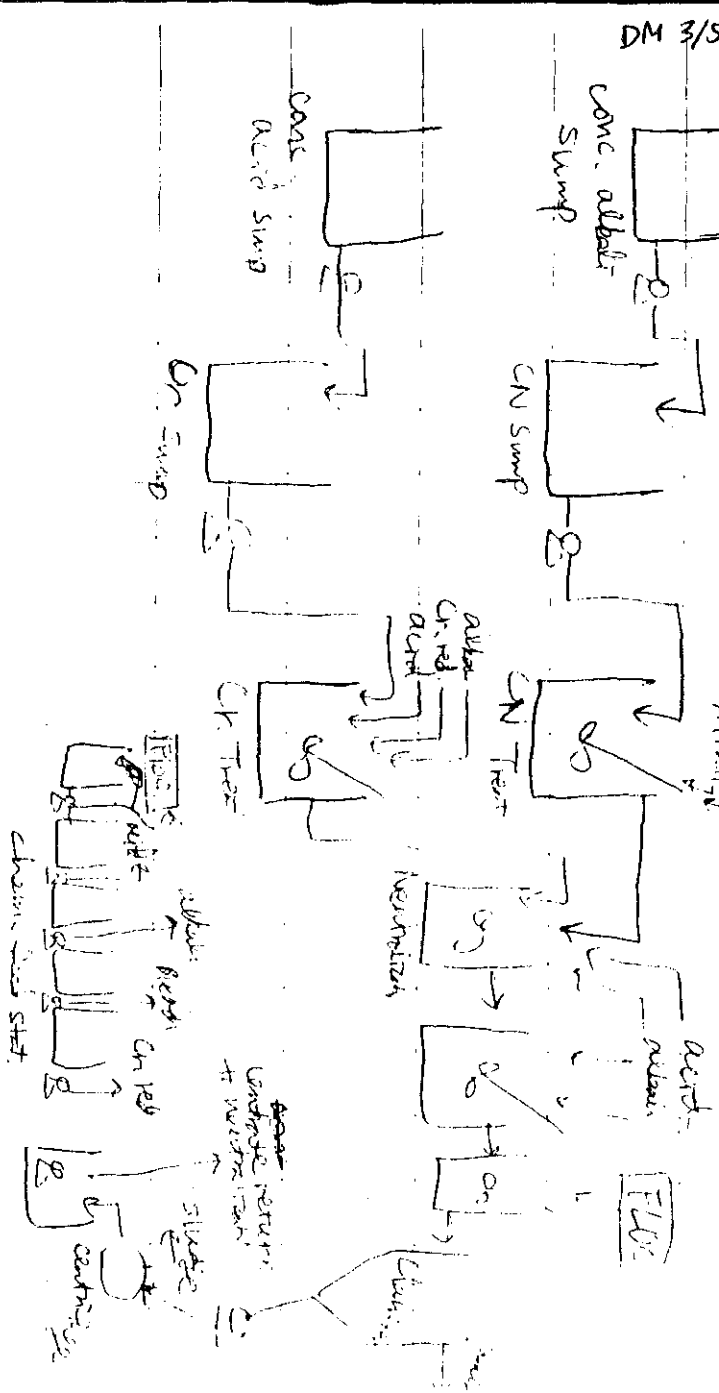
9. **Waste treatment room**
   - situated on a concrete floor
   - floor drains
   - acid rinse water
     CN rinse water
   - for ~~trace~~ rinse water treating (max. 1000 ppm : very dilute)
   - filter cake machine for sludge treatment



DM 3/5/92 50

Photo 8

Waste Treatment



DM 3/5/92
51

c) Photo 9 — filter cake

Photo 10] — holding vessels
Photo 11]

9 · Welding operation of steel anodes
· Baking oven
- hydrogen → atmosphere

10:10 Chromium plating tank rows (about 6-7 rows)
- TCE → degreaser
- recycle solvents
- most release will be by vapor

Cr. Strip.	Caustic anode Cleaner	Cold rinse	Cd. Striping	Chrome rinse

Baths

DM 3/5/92
52

Masking area
- chrome plating

· Metal Finishing area

up to this point, plating processing area where all the tanks are. ~~have~~ ~~open~~ high ceiling → I can see that they ~~got rid of the ceiling~~ broke the ceiling (floor bet. 1st & 2nd floor) to have more overhead space

· River is approx. mile away and Valley is not that far away.

10:20 Inspection area
- Magnetic particle inspection to see any cracks
- concrete floor

(1) Inventories of plating solution in drums DM
- reused

(2) Acropol, Alconox chemical storage drums
- All these drums are taped together

DM 3/5/92
53

by 4 drums

(3) CN waste drum storage area
Photo 12 → access is restricted by fence

(4) Haz waste storage drums — Photo 13
including Cr sludge (in blue plastic drum)
- across from (3)

Photo 14

Photo 15 & 16

Photo 17

* Give them picture from # 13 ~ 18.

(1) - (4) ~~indoor~~ DM
→ indoor, looks like a garage

- Water from City Cleveland
- North of the facility → grass & wood area & downhill there is an Oil company, (Railroad track)
- Most area is paved w/ asphalt and some covered w/ gravels,
- Railroad track bet. Oil Research Co. — open area

3 dust collectors

DM 3/5/92

Chrome plating waste (Dust Collector)
Collecting drums outside (Bag house)
→ storm drain is situated very close → They don't know where this discharge
→ More of these drums on the other side of the building in NE corner — Photo 18
- They are not aware of any major spills at least back to 1985.
- Haz. Waste container storage — in operation for about 1 ~ 2 yrs.
- They purchased this site in ~~1980~~ DM 1979. (December 1979)
- It was owned by several owners.
- Waste code U226 is not right *. It should be 1,1,1-TCA
- Lead contaminated waste — from plating anodes.

DM 3/5/92

55

- Xylene cont. waste
- Air permit #
- We obtained manifests (annual haz waste report) and air permit documentations from John's office.

9 | Photo 19 | 11:20

Old Drum Storage area right next to the dust collector

- Industrial area

11:25 Finished our tour

- On the ~~East~~ DM West - Consolidated Freightways C.

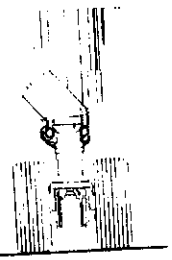
Mun

56

Cleveland Pneumatic
Landing Gear

Cleveland Pneumatic Company
3781 East 77th Street | Cleveland, Ohio 44105
216 | 429 4202

Neil R. Harris
Manager,
Materials and Process Engineering



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

February 25, 1992

John Owens
Metals Applied, Inc.
2800 East 33rd Street
Cleveland, OH 44115

Re: Visual Site Inspection
Metals Applied, Inc.
Cleveland, Ohio
ID No. OHD 004 173 621

Dear Mr. Owens:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for March 5, 1992. The inspection team will consist of Jim Styers and Dana Mun of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio EPA may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion may be made available upon request.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: David Werty, Ohio EPA NEDO
David Sholtiz, Ohio EPA CO
Janine Secord, Ohio EPA CO

REMEDIAL SITE ASSESSMENT DECISION EPA - REGION 5

SITE NAME: Cleveland Pneumatic Plat **EPA ID#** OHD004173621

ALIAS SITE NAME(S): Metals Applied Tac

CITY: _____ **COUNTY:** _____ **STATE:** OH

REPORT DATED: 11/2000 **REPORT TYPE:** Memo

REPORT PREPARER: EPA - SF/RCRA **SITE TYPE:** ____ GAO X IG

DISCUSSION/RATIONALE: "Lead Confirmed" - Site deferral to RCRA is correct.

Special Initiative Flag entered.

See attached.

Report Reviewed/ Site Decision Made by: J Griffin / J Pels **Date:** 11/22/00

Region 5 Revision of EPA Form # 9100-3,11/00 – Special - IG Audit

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: November 20, 2000

SUBJECT: Lead Confirmation for Sites Identified in the FY'1999 OIG Audit of Sites Deferred to RCRA

FROM: Joseph Duffick
Brownfield/Early Action Section
Superfund Division

Gerald Phillips
Corrective Action Manager
Waste, Pesticides & Toxics Division

TO: SITE FILES

This memo is to memorialize the lead decisions for those sites that the Office of the Inspector General (OIG) identified in the March 1999 report, entitled "Superfund Sites Deferred to RCRA." The OIG audit recommended that Superfund reevaluate all deferred sites not in the RCRA corrective action workload to determine the best legal authority to address the sites, and any response actions necessary in order to improve communication between the programs. The OIG also recommended that the two programs should reach agreement on which program will take lead responsibility for each of the sites by the end of calendar year 2000.

The OIG lists for Region 5 included (493 sites) 'Sites Subject to Corrective Action', and (184 sites) 'RCRA Handlers' that may not be subject to corrective action. These two lists (attached) have been reviewed by both programs and are identified with one of the three Special Initiative flags. For those sites that have been scored under the RCRA NCAPS model, they are noted as RCRA Deferral - Lead Confirmed. For those sites to be addressed under Superfund, they are identified on the attached lists as RCRA Deferral - New Decision or RCRA Deferral - Further Assessment. All sites requiring reassessments by Superfund will have findings provided to RCRA for their information.

Attachments (2) *

cc: State Site Assessment Contacts
EAPMs

* FOR ATTACHMENTS PLEASE REFER TO THE FOLLOWING TWO SITE FILES:
AKZO COATINGS INC. ILD006390553
AG COMMUNICATION SYS. ILD005070545

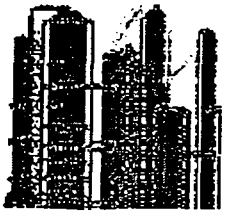
Superfund Site Assessment Data Management

EPA - Office of Emergency and Remedial Response

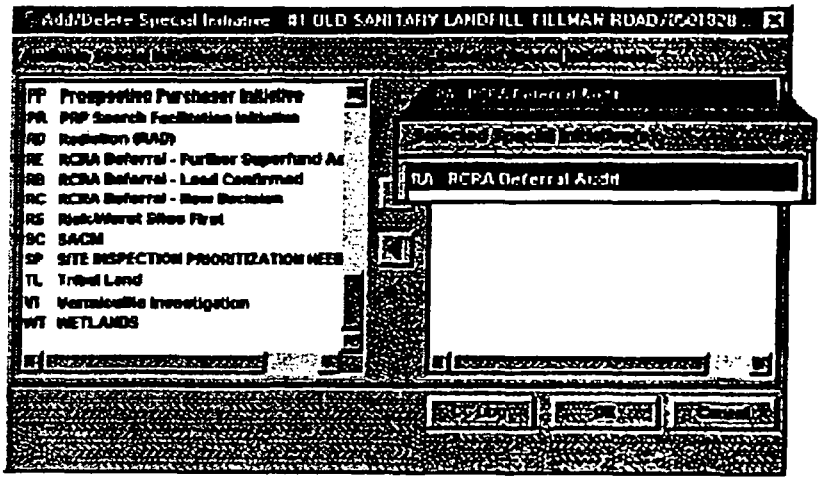
Reporting RCRA Deferral Activities

July 2000

What are RCRA Deferral Sites?



A March 1999 report by EPA's Office of the Inspector General (OIG) identified 2,941 Superfund sites that have been deferred to the Resource Conservation and Recovery Act (RCRA) program. The OIG report determined that 842 sites are being appropriately addressed under RCRA, and 2,099 need further attention.



EPA has developed two measures to track and evaluate these 2,099 sites in WasteLAN. First, EPA Headquarters will flag the sites using the existing "RCRA Deferral Audit" Special Initiative, and Regions will be able to enter one of the following three new Special Initiatives: RCRA Deferral—Lead Confirmed; RCRA Deferral—New Decision; or RCRA Deferral—Further Assessment. The second measure adds a new WasteLAN action, "Site Reassessment", that will track reassessment activities at sites.

How Will Tracking RCRA Deferral Sites Benefit EPA?

Use of the one existing and three new Special Initiatives and the new WasteLAN action, "Site Reassessment," will allow EPA to:

- Readily identify the OIG RCRA deferral sites and accurately report their current status;
- Effectively track reassessment activities, recording dates and fiscal year accomplishments; and
- Receive proper credit for reassessment work performed in the Regions.

Additionally, these new initiatives allow the Regions to track the status of RCRA deferral sites that were identified in the 2,099 sites needing further attention. The new "Site Reassessment" action does not replace current assessment actions; it serves as a supplement in instances when some assessment is needed to evaluate new information on a site, yet a full assessment action is not warranted under the Superfund program.

How Will Regional Staff Maintain RCRA Deferral Activities?

Regions will be responsible for entering the new WasteLAN Special Initiatives. The new Regional Special Initiatives are:

- RCRA Deferral—Lead Confirmed: Indicates that the RCRA-Deferral decision was accurate; i.e., there is no change to the current RCRA deferral status.
- RCRA Deferral—New Decision: Indicates that EPA is correcting or changing the currently-listed decision from "Deferred to RCRA" to another indicator.
- RCRA Deferral—Further Superfund Assessment: Indicates that EPA needs to conduct further assessment to update the status. (This initiative should be used in conjunction with the new Site Reassessment action.)

Regions will also be responsible for recording Site Reassessment activities using the new WasteLAN action.

Who Can I Contact for More Information?

Jennifer Griesert — Data Sponsor — (703) 603-8888 — griesert.jennifer@epa.gov

WasteLAN Techline — (703) 247-4711 — techline@marasconewton.com